

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ELIZABETH ALICEA, MICHELLE URRUTIA, )  
KATINA RAMOS, and JACK ARTINIAN, )  
Individually and on behalf of all )  
others similarly situated, )

Plaintiffs, )

-vs-

18 CV 05381

COUNTY OF COOK, and THOMAS J. DART, )  
in his official capacity as )  
Sheriff of Cook County, )

Defendants. )

The discovery deposition of Rule 30(b)(6)  
Witness EDWARD SAJDAK, taken pursuant to the provisions  
of the Code of Civil Procedure and the Supreme Court  
Rules of the State of Illinois pertaining to the taking  
of depositions for the purpose of discovery, taken before  
DEANNA L. TUFANO, Certified Shorthand Reporter of the  
State of Illinois, at 77 West Washington Street, Suite  
1220, on March 13, 2019, at 2:12 p.m.

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Deanna L. Tufano, C.S.R.

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 ZIMMERMAN LAW OFFICES, P.C. 3 MR. THOMAS A ZIMMERMAN, JR. 4 MR. NICKOLAS J. HAGMAN 5 77 West Washington Street, Suite 1220 6 Chicago, IL 60602 7 (312) 440-0020 8 tom@attorneyzim.com 9 on behalf of Plaintiffs; 10 11 REITER BURNS, LLP 12 MS. ELIZABETH A. EKL 13 MR. DANIEL J. BURNS 14 311 S. Wacker Drive, Suite 5200 15 Chicago, IL 60606 16 (312) 878-1297 17 Eekl@reiterburns.com 18 19 on behalf of Defendants. 20 21 REPORTED BY: DEANNA L. TUFANO, CSR 22 LICENSE NO. 084-003819 23 24 ALSO PRESENT: Lieutenant Donald Milazzo Superintendent Cervantes Superintendent Antwann Boyd</p>	<p style="text-align: right;">Page 3</p> <p>1 INDEX 2 3 WITNESS PAGE 4 EDWARD SAJDAK 5 Examination by Mr. Zimmerman ..... 4 6 Examination by Ms. Ekl ..... 92 7 EXHIBITS 8 MARKED 9 NUMBER 10 Exhibit No. 5 ..... 10 11 Previously marked Exhibit Nos. 1, 2, and 4 were referred 12 to. 13 14 15 16 17 18 19 20 21 22 23 24</p>
<p style="text-align: right;">Page 4</p> <p>1 (Witness sworn.) 2 EDWARD SAJDAK, 3 called as a witness herein on behalf of the Plaintiff, 4 having been first duly sworn, was examined and testified 5 as follows: 6 EXAMINATION 7 BY MR. ZIMMERMAN: 8 Q Okay. Would you please state your name and spell 9 it for the record. 10 A Edward Sajdak, E-D-W-A-R-D, S-A-J-D-A-K. 11 Q This is the deposition of Edward Sajdak taken 12 pursuant to notice and set to today's date by agreement 13 of the parties. 14 Do you have an official title, sir? 15 A Superintendent. 16 Q Can I call you Superintendent Sajdak? 17 A Yes. 18 Q Are you currently employed? 19 A Yes. 20 Q By whom? 21 A Cook County Sheriff's Office. 22 Q Have you given a deposition before? 23 A Yes. 24 Q All right. So if there's a question you don't</p>	<p style="text-align: right;">Page 5</p> <p>1 understand, let me know. I'll be happy to rephrase it or 2 reask it. If you answer a question, I'll assume you've 3 heard and understood it, fair enough? 4 A Yes. 5 Q And just like in the last deposition, if there's 6 something you need to go back and correct, please do that 7 and we'll keep moving? 8 A Yes. 9 Q Where are you the superintendent at? 10 A Leighton Criminal Courthouse. 11 Q Is that 26th and California? 12 A Yes. 13 Q And generally, what your job duties as 14 superintendent there? 15 A I supervise the sheriff's staff who are charged 16 with staffing the courthouse and the court operations 17 from the sheriffs and in the courthouse, that would 18 include not just attending to the courts, but court 19 security for the building, the entryways, and prisoner 20 security as well. 21 Q And how long have you been superintendent there? 22 A Almost two years. 23 Q And prior to that, what was your position? 24 A I was the superintendent of the Daley Center</p>

<p style="text-align: right;">Page 6</p> <p>1 Courts.</p> <p>2 Q Approximately what period of time was that?</p> <p>3 A I was there for about five and a half years.</p> <p>4 Q So we have a dep notice, Exhibit No. 1. It's a</p> <p>5 master set of exhibits and it asks the Defendants to</p> <p>6 designate a person most knowledgeable to testify</p> <p>7 concerning five topics. Are you that person who's been</p> <p>8 designated to testify as to these five topics as it</p> <p>9 relates to the Leighton Courthouse?</p> <p>10 A Five, yes; four, yes; three, yes; two, possibly</p> <p>11 placed, yes; one, I could not be 100 percent certain of.</p> <p>12 Q All right. So what did you do to gather the</p> <p>13 knowledge and information in order to testify as to the</p> <p>14 knowledge of the County of Cook and the Sheriff of Cook</p> <p>15 County as to these topics?</p> <p>16 A I reviewed the photographs of the holding cells</p> <p>17 to confirm accuracy as identified, and I also looked at</p> <p>18 the court minutes sheet relating to specific defendants.</p> <p>19 Q Would that be for the four plaintiffs in the</p> <p>20 case?</p> <p>21 A I have two. I have Jack Artinian and Michelle</p> <p>22 Urrutia?</p> <p>23 Q Okay. So if somebody were brought into Leighton</p> <p>24 Branch 1 Room 100 for booking, would that show up on the</p>	<p style="text-align: right;">Page 7</p> <p>1 printouts that you reviewed?</p> <p>2 MS. EKL: Objection. Form. Go ahead.</p> <p>3 BY THE WITNESS:</p> <p>4 A We don't have booking there. That's bond court.</p> <p>5 That's a courtroom.</p> <p>6 Q If somebody were brought to Branch 1 Room 100 for</p> <p>7 bond court, would that show up on the printouts that you</p> <p>8 reviewed?</p> <p>9 A I do not believe so.</p> <p>10 Q Would that show up on a different printout</p> <p>11 somewhere else?</p> <p>12 A Yes. This seems to indicate someone who's been</p> <p>13 in court already and a future court date.</p> <p>14 Q I see. So what system is there within the</p> <p>15 sheriff's office or the court systems that you're able to</p> <p>16 access that would indicate whether somebody was brought</p> <p>17 to bond court Branch 1 Room 100?</p> <p>18 A That would come from a document generated by the</p> <p>19 Department of Corrections receiving room who receives all</p> <p>20 the prisoners from the Chicago Police Department for bond</p> <p>21 court.</p> <p>22 Q And did you review those documents in preparation</p> <p>23 for your deposition?</p> <p>24 A I did not.</p>
<p style="text-align: right;">Page 8</p> <p>1 Q Would that document also show if the person</p> <p>2 bonded out that same day that they were brought in?</p> <p>3 A It would not.</p> <p>4 Q Is there some system or report or database that</p> <p>5 would show that?</p> <p>6 A There would be a report generated on those. If</p> <p>7 it was someone with who received an I bond who is being</p> <p>8 released from bond court, they with would be listed as</p> <p>9 releases by the DOC staff. If they were bonded out, it</p> <p>10 would have to go through the clerk's office, so that</p> <p>11 would be clerk's database to verify money was posted and</p> <p>12 they were released.</p> <p>13 Q I see. And how would the I bond be recorded in</p> <p>14 the system, would it just say released?</p> <p>15 A The Department of Corrections would have a form,</p> <p>16 yes, based on the paperwork generated in the court that</p> <p>17 would indicate that that individual received an I bond to</p> <p>18 be released and had no additional holds that would</p> <p>19 prevent them from being released.</p> <p>20 Q And is that a system that you have access to?</p> <p>21 A I do not access the system, no. If it is</p> <p>22 electronic in nature, I did not access that know because</p> <p>23 the releases are conducted by the Department of</p> <p>24 Corrections.</p>	<p style="text-align: right;">Page 9</p> <p>1 Q Got it. All right. Did you talk to anybody to</p> <p>2 gather the information or the subject of the topics in</p> <p>3 the dep notice?</p> <p>4 A No. Other than going through this information</p> <p>5 yesterday.</p> <p>6 Q Okay. So other than reviewing the documents you</p> <p>7 mentioned and reviewing them, did you do anything else to</p> <p>8 try to gather the information that you're going to be</p> <p>9 testifying about today pursuant to the dep notice?</p> <p>10 A No.</p> <p>11 Q All right. You didn't perform any searches of</p> <p>12 anything in terms of like a computer search or a record</p> <p>13 search?</p> <p>14 A No.</p> <p>15 Q So somebody gave you the documents then to</p> <p>16 review?</p> <p>17 A The documents that you're referring to?</p> <p>18 Q The photos and the court minute sheet.</p> <p>19 A Yes, correct.</p> <p>20 Q All right. If there is a faster way to do this</p> <p>21 then what happened in the last deposition, I am all ears.</p> <p>22 So I don't know if you had this thing grouped in a</p> <p>23 certain way that would make sense.</p> <p>24 A The photographs that I have here, whatever it is,</p>

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<p>1 I am assuming you have the same exact copy of whatever it</p> <p>2 is.</p> <p>3 Q Yes.</p> <p>4 A The vast majority of them except the first few at</p> <p>5 the first floor whatever are labeled by courtroom, so</p> <p>6 they identify exactly where they are located in the</p> <p>7 building. The first floor is not specific. The basement</p> <p>8 is not specific. Everything else is broken down by</p> <p>9 location of courtroom.</p> <p>10 Q All right. We haven't marked these yet.</p> <p>11 THE COURT REPORTER: These would be Exhibit No. 5,</p> <p>12 Counsel.</p> <p>13 (Exhibit No. 5 was marked</p> <p>14 as requested.)</p> <p>15 BY MR. ZIMMERMAN:</p> <p>16 Q You can look at whatever is convenient for you.</p> <p>17 If you've got notes on yours, that will help you, by all</p> <p>18 means have at it.</p> <p>19 A Okay.</p> <p>20 Q So let's start with the top one. We can</p> <p>21 reference these as what they're called as opposed to that</p> <p>22 CCB-CAM number because I don't think there's any</p> <p>23 duplicates?</p> <p>24 A There is not.</p>	<p>1 Q So that will make it easy. So we have got</p> <p>2 Basement, Room B110 west end of building. What is that</p> <p>3 photo showing?</p> <p>4 A The first ten photos in this packets are actually</p> <p>5 the upper bridge, which is the basement holding facility</p> <p>6 that is run by the Department of Corrections. This is</p> <p>7 the area in which when prisoners are brought to court</p> <p>8 from the jail, they're brought to these holding cells and</p> <p>9 then taken from this area up to the individual</p> <p>10 courtrooms. And just like with the first photo in the</p> <p>11 upper, right-hand corner of the photo there's a number.</p> <p>12 The cells are numbered on the upper bridge, 4 through 8,</p> <p>13 I believe, is the last number, which I don't think you</p> <p>14 can see clearly. There's no number listed on that</p> <p>15 picture. Those are on the upper bridge. Those are male</p> <p>16 holding facilities with the Department of Corrections.</p> <p>17 Then behind that, you have two more photos,</p> <p>18 which I believe these are the photos that represent the</p> <p>19 female holding cells on the bridge with the Department of</p> <p>20 Corrections.</p> <p>21 Q Okay.</p> <p>22 A And finally after, that you've got Basement, B105</p> <p>23 west side of building, there's 3 photos of one large</p> <p>24 cell. That's what was called the lower bridge. You can</p>
Page 12	Page 13
<p>1 see the stairs coming down there on the left-hand side</p> <p>2 that's coming down from 4, 5, 6, 7, 8, and that is a</p> <p>3 holding cell that is used by the Department of</p> <p>4 Corrections. When they come back from court, they're</p> <p>5 placed there based on division, and then once they have</p> <p>6 them all down they'll take them out of there, and they</p> <p>7 will walk them directly at the top part of your</p> <p>8 photograph there, you'll see a cart that's there at least</p> <p>9 on.</p> <p>10 Q B105?</p> <p>11 A Yes. There's a cart there behind the cart, you</p> <p>12 can see a doorway. That doorway leads through the tunnel</p> <p>13 system back into the divisions of the jail, so that's</p> <p>14 were they're taken out. So those ten photos are on the</p> <p>15 bridge, the basement holding facility where the prisoners</p> <p>16 come over for court.</p> <p>17 Q All right. That was perfect. So let me just</p> <p>18 kind of break it down a little bit. Just so that the</p> <p>19 record is clear with certain numbers and whatnot.</p> <p>20 Basement, Room B110 West, B109 West -- well, let me start</p> <p>21 over.</p> <p>22 There's a photo Basement, Room B110 West and</p> <p>23 then that is a photo showing the Holding Cell Number 4;</p> <p>24 is that right?</p>	<p>1 A Correct.</p> <p>2 Q The next photo Basement, Room B1209 West is photo</p> <p>3 a showing primarily the Holding Cell Number 5?</p> <p>4 A Correct.</p> <p>5 Q Basement, Room B108 West is a photo showing the</p> <p>6 Holding Cell Number 6?</p> <p>7 A Correct.</p> <p>8 Q Basement, B107 west is a photo showing the</p> <p>9 Holding Cell Number 7?</p> <p>10 A Correct.</p> <p>11 Q Basement B120 South is a photo showing the</p> <p>12 Holding Cell Number 8?</p> <p>13 A I believe that is correct, yes.</p> <p>14 Q And so these are used I believe you say for</p> <p>15 males, right?</p> <p>16 A That is correct.</p> <p>17 Q And if somebody is in the custody of Department</p> <p>18 of Corrections, they'll be brought from the jail and</p> <p>19 placed in one of these cells. And then from here,</p> <p>20 they're brought up to their court; is that right?</p> <p>21 A Correct.</p> <p>22 Q There's no toilets in these, are there?</p> <p>23 A There is all the way in the back corner.</p> <p>24 Q Of number 4, the back right?</p>

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<p>1 A Yes.</p> <p>2 Q And 5 would it be the back left corner?</p> <p>3 A I believe so. I am not sure. I haven't been</p> <p>4 down there in a long time, but I can't see on the other</p> <p>5 ones with any clarity that there are any restroom</p> <p>6 facilities.</p> <p>7 Q Would there be a holding cell with no toilet in</p> <p>8 it?</p> <p>9 A There can be.</p> <p>10 Q What happens then if the person being held if</p> <p>11 there needs to use the restroom?</p> <p>12 A They're taken out to a facility, either one of</p> <p>13 these here or to another one.</p> <p>14 Q A different holding cell with a toilet?</p> <p>15 A Yes.</p> <p>16 Q All right. Then we get to Basement, B121 South</p> <p>17 which appears to be a photo of Holding Cell Number 2?</p> <p>18 A Yes.</p> <p>19 Q And Basement, B122 South, which appears to be a</p> <p>20 photo of Holding Cell Number 1?</p> <p>21 A Yes.</p> <p>22 Q And I believe you testified that these were the</p> <p>23 holding cells for females who are held in jail and</p> <p>24 Department of Corrections will bring them in and place</p>	<p>1 them in here and then they wait in there and then they go</p> <p>2 up to their court hearing; is that right?</p> <p>3 A Correct.</p> <p>4 Q Now in B121 South, it looks like there's a toilet</p> <p>5 in that one, right?</p> <p>6 A Yes.</p> <p>7 Q And there's also one in the B122 South in the</p> <p>8 back right, right?</p> <p>9 A It appears that way.</p> <p>10 Q Okay. Then we go to B -- I guess it would be</p> <p>11 Basement Vest. B105 West?</p> <p>12 A The next three are the same.</p> <p>13 Q It's CCB.CAM 0.063, 0.064, 0.066, right?</p> <p>14 A Yes.</p> <p>15 Q All right. And I believe you testified that</p> <p>16 these are pictures of essentially the same holding cell</p> <p>17 where after the person who's in the custody of Department</p> <p>18 of Corrections when they're done with court, they're</p> <p>19 brought down and held in here, and then at some point</p> <p>20 they're walked out that doorway way at the back of 0.064</p> <p>21 behind the cart to go back to jail, right?</p> <p>22 A Correct.</p> <p>23 Q And there's no toilet in this holding cell</p> <p>24 though?</p>
Page 16	Page 17
<p>1 A No.</p> <p>2 Q So if somebody needed to use the restroom, they</p> <p>3 would alert somebody and then they would be brought</p> <p>4 somewhere to use the toilet?</p> <p>5 A Correct. These are meant for very short-term</p> <p>6 detention.</p> <p>7 Q The one at the end before they go back to jail?</p> <p>8 A Correct.</p> <p>9 Q Are both men and women held in that one before</p> <p>10 they go back to jail after court?</p> <p>11 A No. Men only.</p> <p>12 Q And where are the females held?</p> <p>13 A In those ones that we identified as the female</p> <p>14 holding number one and two.</p> <p>15 Q So those two female holding cells are both for</p> <p>16 before court and after court?</p> <p>17 A Yes.</p> <p>18 Q Okay. Then we hit 1st Floor, Vestibule 1022</p> <p>19 South. And what is that photo showing?</p> <p>20 A That is a holding cell behind Courtroom 101.</p> <p>21 Q So if somebody is going to Courtroom 101, would</p> <p>22 they be placed in this holding cell?</p> <p>23 A Possibly. The next four photos are all holding</p> <p>24 cells for 101. There's three holding cells, so you have</p>	<p>1 a total of four photos here. This is the smallest one.</p> <p>2 This is an isolation cell or if someone is protective</p> <p>3 custody or something, they would be placed in a smaller</p> <p>4 one. And then beyond that, you have two larger.</p> <p>5 The next photograph which is indicated as 1023</p> <p>6 South, that is a holding cell for 101 as well for new</p> <p>7 arrests. The one beyond that 1029 which is the much</p> <p>8 larger one is for Department of Correction detainees, all</p> <p>9 for Courtroom 101.</p> <p>10 Q And what about -- well, I guess there's two</p> <p>11 holding 1029 Souths. One is 1.020 and 1.023, are those</p> <p>12 photos of the same?</p> <p>13 A They're from the same holding cell from different</p> <p>14 angles.</p> <p>15 Q There's two cameras in that one?</p> <p>16 A There's two cameras, yes. The first camera is</p> <p>17 looking in from the door of the lockup. The second photo</p> <p>18 is looking from the wall towards the door of the lockup.</p> <p>19 Q So if somebody were going to Courtroom 101 then</p> <p>20 if they needed some special issue, they would likely be</p> <p>21 placed in the holding cell shown in Vestibule 1022 South;</p> <p>22 is that right?</p> <p>23 MS. EKL: Objection to form. Did you just say if</p> <p>24 there was a special issue?</p>

<p style="text-align: right;">Page 18</p> <p>1 MR. ZIMMERMAN: Yes, like protective custody, isn't</p> <p>2 that what you said?</p> <p>3 BY THE WITNESS:</p> <p>4 A That cell can be used for people of that nature</p> <p>5 where you're not putting them into general population.</p> <p>6 It's not exclusive for that, but we can use it for</p> <p>7 anybody, it's a very small cell. So if there was a need</p> <p>8 to have someone housed separately, we would utilize that</p> <p>9 cell.</p> <p>10 BY MR. ZIMMERMAN:</p> <p>11 Q All right. And then the next one Detention 1023</p> <p>12 would be for new arrests who are going to Courtroom 101?</p> <p>13 A Primarily, yes.</p> <p>14 Q And then the next two holding 1029 South would be</p> <p>15 for Department of Correction detainees who came out of</p> <p>16 that basement holding facility, and then they would be</p> <p>17 brought up to this holding cell before they went into</p> <p>18 Courtroom 101?</p> <p>19 A Correct.</p> <p>20 Q Is this male or female?</p> <p>21 A Male.</p> <p>22 Q All of them?</p> <p>23 A Male, yes.</p> <p>24 Q Is there a toilet in the Vestibule 1022 South</p>	<p style="text-align: right;">Page 19</p> <p>1 holding cell?</p> <p>2 A No.</p> <p>3 Q Is there a toilet in the Detention 1023 South</p> <p>4 holding cell?</p> <p>5 A No.</p> <p>6 Q All right. I see the toilet in holding 1029</p> <p>7 South from the doorway looking in, do you see that, in</p> <p>8 the back left-hand corner?</p> <p>9 A Yes.</p> <p>10 Q All right. So we may be getting to this next,</p> <p>11 but are there special holding cells for Courtroom 101 for</p> <p>12 females?</p> <p>13 A No.</p> <p>14 Q Are they brought to holding cells if they're</p> <p>15 going up to Courtroom 101?</p> <p>16 A Generally if there is a female that's coming up</p> <p>17 to 101, they're brought up directly from the bridge. If</p> <p>18 there's a need to recall a female prisoner, they have a</p> <p>19 bench that is outside here, which they will secure them</p> <p>20 on, which is behind a partition. So that they're</p> <p>21 separated visually. But generally speaking because we</p> <p>22 don't have that many females for this call, whatever it</p> <p>23 is, they're housed on the bridge downstairs and they're</p> <p>24 brought up when they're needed for court.</p>
<p style="text-align: right;">Page 20</p> <p>1 Q Fair enough. All right, then we go to the next</p> <p>2 set 1st Floor Behind Courtroom 100 North. There's three</p> <p>3 of those, can we talk about those in a group?</p> <p>4 A Sure.</p> <p>5 Q So there's CAM 1.046 what is that showing?</p> <p>6 A It is a holding cell, the male holding cell,</p> <p>7 behind Courtroom 100. There are two male cells behind</p> <p>8 100 and 102. 100 and 102 are back to back, so there's a</p> <p>9 cell on one side, which is this one. And then there's a</p> <p>10 cell across the way which are the next two photos. The</p> <p>11 next two photos are the same cell, just from different</p> <p>12 angles.</p> <p>13 Q Okay. So CAM 1.050 and 1.052 show the same</p> <p>14 holding cell?</p> <p>15 A Correct.</p> <p>16 Q And is that used for a Courtroom 100?</p> <p>17 A 102.</p> <p>18 Q Males?</p> <p>19 A Yes. But in the event that for some reason we</p> <p>20 have a large number of prisoners for 100, they may</p> <p>21 flip-flop the two because they're literally across the</p> <p>22 hall from one another and the courtrooms are back to</p> <p>23 back. But generally speaking, this is used for the 102</p> <p>24 prisoners.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q All right. Is there a toilet in either one of</p> <p>2 these two holding cells?</p> <p>3 A In both.</p> <p>4 Q Well, the next two deal with Holding Cell 2013</p> <p>5 behind courtroom 208. Can we talk about those as a</p> <p>6 group?</p> <p>7 A Yes.</p> <p>8 Q What is the photo in 2.007 showing?</p> <p>9 A That's a photo of the entry to the holding cell</p> <p>10 behind courtroom 208.</p> <p>11 Q And what is 2.008 showing?</p> <p>12 A That's showing the hallway leading to the holding</p> <p>13 cell of 208.</p> <p>14 Q So that's the hallway leading to the cell shown</p> <p>15 in 2.007?</p> <p>16 A Correct.</p> <p>17 Q So if somebody were going to Courtroom 208, is</p> <p>18 this the holding cell that they would be placed in?</p> <p>19 A Probably depending on the prisoner count for that</p> <p>20 day. On the second floor and third floor of the</p> <p>21 Courthouse, the lockups are laid out differently than the</p> <p>22 rest of the building because these were, quote, unquote,</p> <p>23 remodeled since the building opened in 1929. So we've</p> <p>24 got four cells on the north side and the south side of</p>



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<p>1 the second floor and the third floor. Depending on if we</p> <p>2 have a heavy count of prisoners that day and we have a</p> <p>3 lot of females, there may be one cell that is going to be</p> <p>4 used exclusively for females.</p> <p>5 Generally speaking, they will usually use one of</p> <p>6 the cells at the end of the hallway because it's out of</p> <p>7 sight from the other cells and the male prisoners. So</p> <p>8 there are times when this may be used exclusively as a</p> <p>9 female cell for all the prisoners on 2 South, 5, 6, 7, 8.</p> <p>10 Not always. The female prisoner numbers aren't always</p> <p>11 that great to where we would normally keep them</p> <p>12 downstairs on the bridge, and then go and bring them up</p> <p>13 when they're needed for court and then they're brought</p> <p>14 right back down.</p> <p>15 Q Okay. When you say 2 South 5, 6, 7, and 8, are</p> <p>16 you referring to the holding cells or the Courtrooms?</p> <p>17 A The holding cells for those adjoining courtrooms,</p> <p>18 yes. 205, 206, 207, 208.</p> <p>19 Q All right. If I look at 2.007, so the door, the</p> <p>20 glass door to the holding cell is open to the back right</p> <p>21 corner, is that a toilet?</p> <p>22 A Yes.</p> <p>23 Q So that can be seen if that glass door were</p> <p>24 closed and the big black iron part of it would have been</p>	<p>1 moved towards the middle or does that big black iron part</p> <p>2 stay there and then the other part of the door slide over</p> <p>3 to it?</p> <p>4 A The door slides over to that.</p> <p>5 Q I see. All right. The next three photos deal</p> <p>6 with the holding cell behind Courtroom 207?</p> <p>7 A Actually, the next two photos are of the cell</p> <p>8 that is in between 208 and 207. This is just like we had</p> <p>9 outside of 101, an isolation cell. So these next two</p> <p>10 photos 2.010 and 2.012 indicate that cell. That is not</p> <p>11 designated to a particular courtroom.</p> <p>12 Q So this would be an isolation cell that can be</p> <p>13 used for Courtrooms 205, 206, 207, or 208?</p> <p>14 A Correct. There is one isolation cell on each</p> <p>15 side of the floor. Because right directly across from</p> <p>16 this isolation cell is where the elevator is where the</p> <p>17 prisoners come up. So if they needed to put somebody</p> <p>18 that is going to be separate if they were in a case or a</p> <p>19 trial and they were testifying against someone else,</p> <p>20 whatever it is, they can't be housed in the same cell.</p> <p>21 They have to be separate but they have to be readily</p> <p>22 available for testimony, so this is something that could</p> <p>23 be utilized.</p> <p>24 Q I see. Is there a toilet in that isolation cell?</p>
Page 24	Page 25
<p>1 A There is not.</p> <p>2 Q All right. And just so our record is clear,</p> <p>3 2.010 and 2.012 show that isolation cell in between</p> <p>4 Courtrooms 207 and 208?</p> <p>5 A Correct.</p> <p>6 Q The next photo 2.015, what does that show?</p> <p>7 A That is the holding cell behind Courtroom 207.</p> <p>8 Q And is there a toilet behind that smokey glass or</p> <p>9 whatever that glass is on the back right?</p> <p>10 A Yes, there is.</p> <p>11 Q Okay. So if somebody were going to Courtroom</p> <p>12 207, would they likely be placed in this holding cell?</p> <p>13 A Most likely, yes.</p> <p>14 Q And again this would be for males unless you have</p> <p>15 that issue you described earlier where you got a bunch of</p> <p>16 females and you're going to need a spot for them?</p> <p>17 A Correct.</p> <p>18 Q All right. The next photo is cell 2.043 behind</p> <p>19 Courtroom 206. What is that one showing?</p> <p>20 A That is the holding cell behind Courtroom 206.</p> <p>21 Q Is there a toilet in that one?</p> <p>22 A Yes.</p> <p>23 Q Is that what's right on the back wall there?</p> <p>24 A Yes.</p>	<p>1 Q All right. And was this used for males?</p> <p>2 A Yes.</p> <p>3 Q Unless you have the female issue again, right?</p> <p>4 A Correct.</p> <p>5 Q So if somebody were going to Courtroom 206, they</p> <p>6 likely would be placed in this holding cell?</p> <p>7 A Yes.</p> <p>8 Q And the next one is Holding Cell 2061 behind</p> <p>9 Courtroom 205, what is that showing?</p> <p>10 A That is the holding cell behind Courtroom 205.</p> <p>11 Q And so if somebody were going to Courtroom 205,</p> <p>12 they would likely be placed in this cell?</p> <p>13 A Yes.</p> <p>14 Q Is there a toilet in there?</p> <p>15 A Yes.</p> <p>16 Q It's sort of in the back to the right?</p> <p>17 A Yes.</p> <p>18 Q All right. There's two of them, the next in line</p> <p>19 Holding Cell 2076 behind courtroom 204; do you see those?</p> <p>20 A Yes.</p> <p>21 Q All right. So CAM 2.036, what is that showing?</p> <p>22 A That is showing a photo of the holding cell</p> <p>23 behind Courtroom 204.</p> <p>24 Q Is this for males?</p>

<p style="text-align: right;">Page 26</p> <p>1 A Most likely. Once again, this is the same thing  2 as we have on the other side, this is on the north side  3 this now, or this is the cell that's down the hallway  4 separated from the cluster of cells. So there are times  5 when it will be used exclusively for a female cell. It  6 doesn't happen often, but it depends on the population,  7 the numbers that are coming up, generally speaking, the  8 females stay down on the bridge until they're needed and  9 they go gown to pick them up. They come up and then they  10 will be dropped right back down.  11 Q Which one out of the other four again was the  12 isolated one for the females for --  13 A 208. And that's the one you have two  14 illustrations of and the second one shows the long  15 hallway.  16 Q Got it.  17 A And that's the same thing as the second photo  18 here on the left side of the one for 2076. It shows the  19 hallway coming back to the elevator, the prisoner  20 elevator.  21 Q So in CAM 2.037, that shows the hallway leading  22 to the holding cell shown in 2.036, right?  23 A That is correct. That's the holding cell on the  24 right of that photograph.</p>	<p style="text-align: right;">Page 27</p> <p>1 Q Okay. And there's a toilet in the cell 2076,  2 right?  3 A That is correct.  4 MR. ZIMMERMAN: You know what, why don't we take roll  5 again. We have a new entrant.  6 MS. EKL: Let's go off the record.  7 (A discussion was had  8 off the record.)  9 MS. EKL: For the record, a couple of other deponents  10 have entered the room, and we'll go ahead and have them  11 introduce themselves.  12 MR. MILAZZO: Lieutenant Don Milazzo, M-I-L-A-Z-Z-O.  13 MR. CERVANTES: Superintendent Cervantes for Rolling  14 Meadows, C-E-R-V-A-N-T-E-S.  15 MR. BOYD: Superintendent Antwann Boyd,  16 A-N-T-W-A-N-N, B-O-Y-D.  17 MR. ZIMMERMAN: And your partner?  18 MR. BURNS: Daniel Burns.  19 BY MR. ZIMMERMAN:  20 Q Okay. So let's go to the next photo Holding Cell  21 2090 behind Courtroom 203. What does that photo show?  22 A That's the holding cell behind Courtroom 203.  23 Q So if someone were coming up to Courtroom 203,  24 they likely would have been placed in that cell?</p>
<p style="text-align: right;">Page 28</p> <p>1 A Correct.  2 Q And there's a toilet in the back of that, right?  3 A Yes.  4 Q And the next three of them --  5 A Actually just the next one. The next one is the  6 holding cell for Courtroom 202.  7 Q That is CAM 2.045?  8 A Correct.  9 Q And if somebody were coming up to Courtroom 202,  10 they likely would be placed in that holding cell?  11 A Yes.  12 Q Is there a toilet in there on the back left?  13 A Yes.  14 Q How about the next two?  15 A The next two photos are that side cell on the 2nd  16 Floor, North outside of Courtroom 202.  17 Q Is this the isolation one?  18 A Yes.  19 Q Just for the record, it's CAM 2.048 and 2.050,  20 right?  21 A Yes.  22 Q So this would be used primarily if somebody was a  23 witness or had to be isolated from the rest of the folks?  24 A Correct.</p>	<p style="text-align: right;">Page 29</p> <p>1 Q Is there a toilet in that one?  2 A No.  3 Q All right. The next one is Holding Cell 2125  4 behind Courtroom 201, what does that show?  5 A That is the holding cell behind Courtroom 201.  6 Q If somebody were going to Courtroom 201, they  7 likely would be placed in this cell?  8 A Yes.  9 Q Is there a toilet in here in the back left?  10 A Yes.  11 Q All right. Now we're up on the third floor. The  12 next photo is --  13 A Next two.  14 Q Good. The next two says 3.005 and 3.006. What  15 do those photos show?  16 A That shows the holding cell behind Courtroom 308.  17 Q If somebody were going to Courtroom 308, would  18 they likely be placed in this cell?  19 A Yes.  20 Q There's a toilet in the back right?  21 A Yes.  22 Q The next -- you tell me, I got three of them  23 here?  24 A Next two.</p>



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<p>1 Q All right. CAM 3.008, 3.010, what do those show?</p> <p>2 A That is the isolation cell outside of Courtroom</p> <p>3 307.</p> <p>4 Q No toilets in that one, right?</p> <p>5 A No toilet.</p> <p>6 Q Okay. The next one Holding Cell 3026 behind</p> <p>7 Courtroom 307, what does that photo show?</p> <p>8 A That's the holding cell behind Courtroom 307.</p> <p>9 Q If somebody were going to Courtroom 307, they</p> <p>10 would likely be placed in this cell, right?</p> <p>11 A Yes.</p> <p>12 Q And there's a toilet in the back right?</p> <p>13 A Yes.</p> <p>14 Q The next one is Holding Cell 3044 behind</p> <p>15 Courtroom 306, what does that show?</p> <p>16 A The holding cell behind Courtroom 306.</p> <p>17 Q If somebody were going to Courtroom 306, they</p> <p>18 likely would be placed in this cell, correct?</p> <p>19 A Yes.</p> <p>20 Q And there's a toilet in the back left on that?</p> <p>21 A Yes.</p> <p>22 Q Next --</p> <p>23 A two.</p> <p>24 Q Good. Next two, CAM 3.021, 3.022, what do those</p>	<p>1 photos show?</p> <p>2 A Holding cell behind Courtroom 305.</p> <p>3 Q If somebody were going to Courtroom 305, they</p> <p>4 likely would be placed in that cell, right?</p> <p>5 A Yes.</p> <p>6 Q And there's a toilet in the back right?</p> <p>7 A Yes.</p> <p>8 Q All right. How about the next two, can we put</p> <p>9 those together?</p> <p>10 A Yes.</p> <p>11 Q That is 3.0373, .038, what do those photos show?</p> <p>12 A The holding cell behind Courtroom 304.</p> <p>13 Q If somebody were going into Courtroom 304, they</p> <p>14 likely would be placed in this cell, right?</p> <p>15 A Yes.</p> <p>16 Q And there's a toilet in the back of that one?</p> <p>17 A Yes.</p> <p>18 Q The next one Holding Cell 3090 behind Courtroom</p> <p>19 303, what does that photo show?</p> <p>20 A That is the holding cell behind Courtroom 303.</p> <p>21 Q If somebody were going into courtroom 303, they</p> <p>22 likely would be placed in this cell; is that right?</p> <p>23 A Yes.</p> <p>24 Q Is there a toilet in the back of that one?</p>
Page 32	Page 33
<p>1 A Yes.</p> <p>2 Q I got three of them here. No, I got more than</p> <p>3 that. I got four of them on 302. Can we group any of</p> <p>4 those?</p> <p>5 A Yes. The first one is showing the holding cell</p> <p>6 behind Courtroom 302. The second one is showing you the</p> <p>7 hallway outside, on the upper left is the elevator for</p> <p>8 the 3rd floor where the prisoners come in.</p> <p>9 Q Where is 302 holding cell in this next picture?</p> <p>10 A Should be to your right.</p> <p>11 Q And then it looks like we got an isolation cell?</p> <p>12 A The next two would be the isolation cell,</p> <p>13 correct.</p> <p>14 Q All right. So let's go back. The photo in 3.046</p> <p>15 is showing the holding cell used for Courtroom 302?</p> <p>16 A Yes.</p> <p>17 Q If somebody were going to Courtroom 302, they</p> <p>18 would likely be placed in this cell?</p> <p>19 A Yes.</p> <p>20 Q Is there a toilet in there?</p> <p>21 A Yes.</p> <p>22 Q And in Photo 3.048 to the right as you're looking</p> <p>23 at it, there's a picture of a holding cell, is that the</p> <p>24 holding cell that we just saw in 3.046?</p>	<p>1 A Correct.</p> <p>2 Q Then we go to 3.049 and 3.051 and that is the</p> <p>3 isolation cell on the third floor?</p> <p>4 A Correct.</p> <p>5 Q Is that behind Courtroom 302?</p> <p>6 A Third floor North, correct. 302 as you can see</p> <p>7 in the upper left, that's the door going into the</p> <p>8 courtroom, and to the far left is the holding cell for</p> <p>9 302.</p> <p>10 Q Got it. No toilet in that one?</p> <p>11 A No.</p> <p>12 Q Next we have two of them, 3.053 and 3.054, what</p> <p>13 are those photos showing, sir?</p> <p>14 A The holding cell behind Courtroom 301.</p> <p>15 Q If somebody were going to Courtroom 301, they'd</p> <p>16 likely would be placed in that holding cell?</p> <p>17 A Yes.</p> <p>18 Q And there's a toilet in the back left?</p> <p>19 A Yes.</p> <p>20 Q On the third floor, is there one of those cells</p> <p>21 that are off by itself that the females would be put in?</p> <p>22 A No.</p> <p>23 Q No?</p> <p>24 A No. Well, you have the option, like I said, of</p>

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<p>1 the ones that are at the end, if they need to use it,  2 they'll use it. Like in this picture here, you've got  3 301, you can see that's the cell by itself. That's the  4 going back two photos to 3.053. You can see that that  5 cell is by itself on the that side of the floor because  6 on the right-hand-side is the long aisle that goes to  7 where the rest of them are.</p> <p>8 Q So in the situation where you would have a whole  9 bunch of females, then that would be the cell they would  10 put in?</p> <p>11 A Yes, most likely.</p> <p>12 Q For the whole third floor?</p> <p>13 A For the north. There's one on each side of the  14 floor.</p> <p>15 Q What about on the other side?</p> <p>16 A 308.</p> <p>17 Q Okay. So on the other side if there's a bunch of  18 females, then you would use Holding Cell 3013 behind  19 Courtroom 308 for them?</p> <p>20 A Correct.</p> <p>21 MR. ZIMMERMAN: Nick wants me to ask you a question.  22 So I guess the 1st Floor and we'll go all the  23 way back.</p> <p>24 A Okay.</p>	<p>1 Q Are there any other cameras on the 1st Floor  2 other than the cameras that are shown in the photos that  3 we have gone through?</p> <p>4 MS. EKL: I'm just going to object to the form  5 because the cameras themselves are not shown in those  6 photographs?</p> <p>7 BY MR. ZIMMERMAN:</p> <p>8 Q You know what I'm saying, don't you? All right.  9 Let's try this again.</p> <p>10 Are there any other cameras on the 1st Floor  11 other than the cameras whose views are in these photos  12 that we went through?</p> <p>13 A Are you asking in relation to the tension areas?</p> <p>14 Q No. I am asking generally.</p> <p>15 A Yes.</p> <p>16 Q And where are those at?</p> <p>17 A Those cameras are in the entryways and the  18 hallways of the building.</p> <p>19 Q Anywhere else?</p> <p>20 A There is also one camera in the female detention  21 area behind 102.</p> <p>22 Q Anywhere else?</p> <p>23 A No.</p> <p>24 Q I don't see a photo here of the female detention</p>
Page 36	Page 37
<p>1 area behind 102?</p> <p>2 A Yes. It's not on this system. The camera that's  3 in use down there is from pre-1970. It has a very  4 distorted black and white image on an old control system  5 that's not looped into this.</p> <p>6 Q I see. Are all of these photos that are in  7 Exhibit No. 5 from the new system?</p> <p>8 A Yes.</p> <p>9 Q Are the cameras on the first floor in the entry  10 and hallways of the building on the new system?</p> <p>11 A Yes.</p> <p>12 Q Is there any camera other than the female  13 detention area behind 102 that is not on the new system?</p> <p>14 A Not to my knowledge, no.</p> <p>15 Q Why didn't they change that one?</p> <p>16 MS. EKL: Objection. Foundation.</p> <p>17 BY MR. ZIMMERMAN:</p> <p>18 Q Is there a way to get a still image off of that  19 female detention area behind 102 camera?</p> <p>20 A I don't have the knowledge to answer that.</p> <p>21 Q Okay. Unfortunately, you have competent Counsel  22 and she'll give me the answer later.</p> <p>23 Okay. How about the second floor, same  24 question, are there any cameras on the second floor other</p>	<p>1 than the cameras whose views are shown in the photos that  2 we've just talked about?</p> <p>3 A Yes.</p> <p>4 Q And where are those at?</p> <p>5 A The public hallway.</p> <p>6 Q Anywhere else?</p> <p>7 A No.</p> <p>8 Q Would you describe the female detention area for  9 me, please, behind Courtroom 102?</p> <p>10 A It's a single cell detention. It is similar to  11 the detention in the male detention in 100, but it's  12 considerably smaller. That would be like about 12 pages  13 in here 1.046 is the number, 1st Floor behind 100 North.</p> <p>14 Q Is there a toilet in that cell?</p> <p>15 A Yes.</p> <p>16 Q All right. So we've have gone through the lower  17 bridge, we've gone through the upper bridge, and I don't  18 think we really explored -- well, probably because I  19 haven't asked the questions yet.</p> <p>20 All right. When somebody comes in to the  21 Leighton Courthouse, they're processed generally?</p> <p>22 A Are you talking about a prisoner?</p> <p>23 Q All right. Let's say somebody is in custody from  24 the Department of Corrections and they're brought in?</p>

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<p>1 A Yes.</p> <p>2 Q Where are they brought?</p> <p>3 A They're brought to the bridge. They're separated</p> <p>4 based on where you're going. And then a movement officer</p> <p>5 will bring them up to the individual floors where they're</p> <p>6 going to be attending court. That officer stays with</p> <p>7 them on the court floor until all the prisoners have</p> <p>8 completed their court hearings and everyone has been</p> <p>9 dropped back down.</p> <p>10 Q And when they're brought into the courthouse,</p> <p>11 what identifying information is obtained from them?</p> <p>12 A Well, the identifies as far as who is coming to</p> <p>13 court whatever it is is done by the Department of</p> <p>14 Corrections. They bring them up to the courtrooms and</p> <p>15 put them in the cells, and all we do on our end is simply</p> <p>16 call out the names of the prisoners who are being called</p> <p>17 for court.</p> <p>18 Q All right. You remember I asked these questions</p> <p>19 of Superintendent Mills. I think he testified that the</p> <p>20 Department of Corrections they got their ID and they get</p> <p>21 scanned.</p> <p>22 A Correct.</p> <p>23 Q Does that happen there at Leighton, too?</p> <p>24 A No. If it does happen, it would be done on the</p>	<p>1 bridge downstairs by DOC. The courts do not do that.</p> <p>2 Q So does the Sheriff's Department obtain any</p> <p>3 information about who's being brought in from DOC? Do</p> <p>4 you know their name?</p> <p>5 A Well, we have them on the court call, that much</p> <p>6 we know. They'll be on the court call.</p> <p>7 Q Their name?</p> <p>8 A Correct.</p> <p>9 Q And what courtroom they're going to?</p> <p>10 A Correct.</p> <p>11 Q Anything else?</p> <p>12 A No.</p> <p>13 Q So when DOC brings them in, is there somebody</p> <p>14 that's got the log and they check it off, say all right,</p> <p>15 I got this guy, I got in guy?</p> <p>16 A The DOC officer on the bridge will do that before</p> <p>17 they're sent up the court based on the court call for the</p> <p>18 day.</p> <p>19 Q Okay. What about if somebody brought in for a</p> <p>20 bond hearing from an outside agency, what happens to them</p> <p>21 when they come into the courthouse?</p> <p>22 A The same thing. They're shipped over from the</p> <p>23 Department of Corrections. We're given a list of all of</p> <p>24 the names that are going to be on the court call for the</p>
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<p>1 day, and they're brought up to the holding cell and</p> <p>2 they're brought out in the order that they're listed.</p> <p>3 Q There's no information regarding the arresting</p> <p>4 agency or if they have a disability or anything like</p> <p>5 that, it's just the name and their courtroom, that's all</p> <p>6 you know?</p> <p>7 A If they're coming to us for a bond hearing Monday</p> <p>8 thru Friday, it's a Chicago Police Department arrest, on</p> <p>9 the weekends we have all of Cook County. So that would</p> <p>10 be suburban as well.</p> <p>11 Q And so what would be the difference between the</p> <p>12 amount of information you would obtain about the person</p> <p>13 coming in whether it's Chicago PD Monday through Friday</p> <p>14 or outside of Chicago PD on a weekend?</p> <p>15 A They're going to be -- once all their paperwork</p> <p>16 is checked for accuracy by the Department of Corrections,</p> <p>17 they have the packet of paper together and they make a</p> <p>18 copy for the state's attorney and for the court clerk,</p> <p>19 and then we have the sheriff copy. So if there's any</p> <p>20 discrepancies or questions, we can refer to it. It would</p> <p>21 be what the Chicago Police have as their golden rod or</p> <p>22 their arrest report. And if they have any background</p> <p>23 information that goes with it, depending on what the</p> <p>24 agency is bringing in. That's all tendered at the time</p>	<p>1 that the prisoner is brought to the receiving room. If</p> <p>2 all the paperwork that's necessary to process is not</p> <p>3 there, the prisoner is refused.</p> <p>4 Q In this situation you'd have their name, address,</p> <p>5 presumably their address, too?</p> <p>6 A If I don't have a Chicago sheet, I would not have</p> <p>7 there address, no.</p> <p>8 Q So if it comes from Chicago PD, you'll have name</p> <p>9 address, and what else?</p> <p>10 MS. EKL: Objection. Form. Assumes facts not in</p> <p>11 evidence.</p> <p>12 BY MR. ZIMMERMAN:</p> <p>13 Q Well, what's on the arrest report?</p> <p>14 A Whatever paperwork that is tendered, yes, to the</p> <p>15 state and to the clerk, the sheriff gets the same copy,</p> <p>16 but we do not have a copy of the arrest report, the state</p> <p>17 gets that because they do a check through leads to verify</p> <p>18 if there's any additional wants for it, and the court</p> <p>19 clerk gets that because it goes into the court file. We</p> <p>20 don't have a need for it on our end.</p> <p>21 Q Okay. So what information would the sheriff</p> <p>22 retain if somebody is brought in from Chicago PD for a</p> <p>23 bond hearing?</p> <p>24 A That would be the Department of Corrections</p>

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<p>1 records. They keep all of the paperwork. We don't keep 2 anything in the courts.</p> <p>3 Q And what would be contained in those Department 4 of Corrections records in terms of identifying 5 information about the person?</p> <p>6 A They would have information concerning if there 7 was a background check that was done, that might be 8 attached to it also.</p> <p>9 Q Would it list their name and address of the 10 person?</p> <p>11 A It should.</p> <p>12 Q What if somebody is transported from the -- now 13 in Skokie there was one category that was transported 14 from Department of Corrections, and Department of 15 Corrections would stay with the prisoner; do you remember 16 he testified about that?</p> <p>17 A That was Illinois Department of Corrections.</p> <p>18 Q Yes. So would that ever happen at Leighton?</p> <p>19 A Yes, it does.</p> <p>20 Q And so if somebody is transported from the 21 Illinois Department of Corrections, how does that 22 processing work?</p> <p>23 A The Illinois Department of Corrections has their 24 own holding cell in the basement next to the bridge, it's</p>	<p>1 completely separate. Those once again are prisoners who 2 have already been convicted of a crime and are serving a 3 sentence in the Illinois Department of Corrections, so 4 they're always segregated from those who are just 5 accused. And same procedure as was mentioned before when 6 that individual is called to court, the Illinois 7 Department of Corrections officers come up with the 8 individual, they attend court, and then they bring the 9 individual back down. The prisoner is not in the custody 10 of the sheriff.</p> <p>11 Q And so what information would you have about the 12 prisoner that would be able to identify who was brought 13 in?</p> <p>14 A Name.</p> <p>15 Q And their courtroom?</p> <p>16 A Yes.</p> <p>17 Q Where is that cell that the Illinois Department 18 of Corrections has, is that in any of these photos?</p> <p>19 A No.</p> <p>20 Q Is it monitored by a camera?</p> <p>21 A I don't have that in my system. I don't know if 22 they have a camera down there or not. It's segregated 23 from the bridge. It's right off of the dock of the 24 building, which is where they bring the prisoners in.</p>
Page 44	Page 45
<p>1 Q Okay. What about outside of the county, is there 2 anybody who is ever brought to Leighton outside of the 3 county?</p> <p>4 A Yes.</p> <p>5 Q And how is that person processed?</p> <p>6 A They're processed in the same manner as IDOC, 7 they stay in the custody of the transporting agency. 8 They're brought up and then they're brought right back 9 down.</p> <p>10 Q Are they placed in the bridge?</p> <p>11 A I don't know if they have a separate cell for 12 them or not up there. Normally they come in through that 13 area, they come through just the same way that an outside 14 delivery of prisoners would come in. But they are, as I 15 said, they're segregated from the Cook County Department 16 of Corrections.</p> <p>17 MS. EKL: Just to be clear to clarify, when you say 18 that they come in, where are you referring to, come into 19 where?</p> <p>20 THE WITNESS: They're brought into the Department of 21 Corrections, just like the other prisoners from outside.</p> <p>22 BY MR. ZIMMERMAN:</p> <p>23 Q What identifying information would you have about 24 the person coming in from outside the county?</p>	<p>1 A Their name, where they're going to --</p> <p>2 Q Name and courtroom?</p> <p>3 A Yeah.</p> <p>4 Q And then the agency bringing them?</p> <p>5 A The agency bringing them, correct.</p> <p>6 Q All right. Let's get back to --</p> <p>7 A 404.</p> <p>8 Q All right. I want to go back to the third floor 9 now.</p> <p>10 Back on the second floor, I think you said that 11 there were cameras in the public hallways and we don't 12 have photos of them in our stack, right?</p> <p>13 A Yes.</p> <p>14 Q Are there any other cameras on the second floor 15 other than the public hallways that we don't have photos 16 of in our stack?</p> <p>17 A No.</p> <p>18 Q Third floor, are there any cameras on the third 19 floor that we don't have photo views of in our stack?</p> <p>20 A Public hallways.</p> <p>21 Q Same thing, all right.</p> <p>22 Anywhere else on the third floor?</p> <p>23 A No.</p> <p>24 Q All right. Holding Cell 408 behind Courtroom</p>

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<p>1 404. What, sir, does that photo show?</p> <p>2 A It's the holding cell behind Courtroom 404.</p> <p>3 Q If somebody were going to Courtroom 404, is this</p> <p>4 the cell they likely would be placed in?</p> <p>5 A Yes.</p> <p>6 Q Is there a toilet in that?</p> <p>7 A Yes, top right.</p> <p>8 Q The next two say Holding Cell 449 behind</p> <p>9 Courtroom 402, can we group those together?</p> <p>10 A Yes.</p> <p>11 Q Good.</p> <p>12 What are the photos in 4.019 and 4.020 showing?</p> <p>13 A The holding cell behind Courtroom 402.</p> <p>14 Q If someone were going to Courtroom 402, would</p> <p>15 they likely be placed in this holding cell?</p> <p>16 A Yes.</p> <p>17 Q Is there a toilet in that one?</p> <p>18 A Yes.</p> <p>19 Q The next one, I guess we have got two of them,</p> <p>20 well, there's three of them. There's Holding Cell 450,</p> <p>21 Holding Cell 450, and Holding Cell 449 and 450. What are</p> <p>22 we doing with these?</p> <p>23 A Holding Cell 450 is two views of the same holding</p> <p>24 cell that is the holding cell for Courtroom 400. The</p>	<p>1 first photo which is 4.021 that shows you the actual</p> <p>2 holding cell. The photo cell of 4.022 is the holding</p> <p>3 cell and on the right shows the where the bathroom is</p> <p>4 which is behind that partition.</p> <p>5 Q If somebody were going to Courtroom 400, would</p> <p>6 they likely be placed in this holding cell?</p> <p>7 A Yes.</p> <p>8 Q What about that next Photo 449 and 450?</p> <p>9 A 450, this is a view on the camera from above the</p> <p>10 prisoner elevator looking straight ahead in between the</p> <p>11 prisoner cell for holding cell for Courtroom 402, and the</p> <p>12 holding cell for 400 is a small isolation cell. That's</p> <p>13 straight ahead on the photo you can see in the open --</p> <p>14 there's an opening right near the center of this photo.</p> <p>15 Q Right.</p> <p>16 A That's the step into that isolation.</p> <p>17 Q Is there a toilet in there?</p> <p>18 A No.</p> <p>19 Q The guys in isolation don't get the toilets?</p> <p>20 A Not in their cell.</p> <p>21 Q Good answer.</p> <p>22 On the fourth floor, are these holding cells for</p> <p>23 males or females?</p> <p>24 A Males.</p>
Page 48	Page 49
<p>1 Q Do females ever go in them?</p> <p>2 A No.</p> <p>3 Q Are there any other -- well, let's back up again</p> <p>4 because I am sure Nick will make me ask this.</p> <p>5 Are there any other holding cells on the first</p> <p>6 floor other than the ones in these photos? Oh yeah, you</p> <p>7 said that, the female detention center?</p> <p>8 A Correct.</p> <p>9 Q All right. Are there any other holding cells on</p> <p>10 the second floor other than the ones in the photos?</p> <p>11 A No.</p> <p>12 Q Are there any other holding cells on the third</p> <p>13 floor other than the ones in these photos?</p> <p>14 A No.</p> <p>15 Q Are there any other holding cells on the fourth</p> <p>16 floor other than the ones in these photos?</p> <p>17 A No.</p> <p>18 Q Are there any other cameras on the fourth floor</p> <p>19 other than the cameras showing the views in these photos?</p> <p>20 A Yes.</p> <p>21 Q All right. Where are those?</p> <p>22 A Public hallway.</p> <p>23 Q Anywhere else on the fourth floor?</p> <p>24 A No.</p>	<p>1 Q Okay. Next two, Holding Cell 585 behind</p> <p>2 Courtroom 506, can those go together.</p> <p>3 A Yes.</p> <p>4 Q What do those show, sir?</p> <p>5 A It shows the holding cell behind Courtroom 506.</p> <p>6 Q If somebody were going to Courtroom 506, would</p> <p>7 they likely be placed in this holding cell?</p> <p>8 A Yes.</p> <p>9 Q Is there a toilet in there?</p> <p>10 A Yes.</p> <p>11 Q On the left?</p> <p>12 A Yes.</p> <p>13 Q Next one room, I guess it's cell 586, behind</p> <p>14 Courtroom 504, can we group those two together?</p> <p>15 A Yes.</p> <p>16 Q I guess just for the record the holding cell</p> <p>17 behind Courtroom 506 is Holding Cell 585 and that's Cam</p> <p>18 5.007 and 5.008, right?</p> <p>19 A Yes.</p> <p>20 Q The Holding Cell 586 behind Courtroom 504 is CAM</p> <p>21 5.009, 5.010, right?</p> <p>22 A Yes.</p> <p>23 Q And what do those photos shows?</p> <p>24 A The holding cell behind Courtroom 504</p>



Page 50	Page 51
<p>1 Q If somebody were going into Courtroom 504, would</p> <p>2 they likely be placed in this holding cell?</p> <p>3 A Yes.</p> <p>4 Q And is there a toilet in this cell?</p> <p>5 A Yes.</p> <p>6 Q That's off to the right side?</p> <p>7 A Yes.</p> <p>8 Q The next two show Holding Cell 549 behind</p> <p>9 Courtroom 502, it's CAM 5.022, 5.023; is that right?</p> <p>10 A Yes.</p> <p>11 Q And what do those photos show?</p> <p>12 A The holding cell behind Courtroom 502.</p> <p>13 Q If somebody were going into Courtroom 502, they</p> <p>14 likely would be placed in this holding cell, right?</p> <p>15 A Yes.</p> <p>16 Q And is there a toilet in that?</p> <p>17 A Yes.</p> <p>18 Q And is that off to the left?</p> <p>19 A Yes.</p> <p>20 Q The next two, Holding Cell 555 behind Courtroom</p> <p>21 500, CAM 5.024, 5.025; is that right?</p> <p>22 A Yes.</p> <p>23 Q What do those photos show?</p> <p>24 A Holding cell behind Courtroom 500.</p>	<p>1 Q If somebody were going to Courtroom 500, they'd</p> <p>2 likely be placed in this cell; is that right?</p> <p>3 A Yes.</p> <p>4 Q Is there a toilet off to the right in there?</p> <p>5 A Yes.</p> <p>6 Q Now, it looks like we might have a couple of</p> <p>7 isolation cells?</p> <p>8 A Yes.</p> <p>9 Q All right. We got Holding Cell 585 and 586</p> <p>10 behind Courtroom 504 and 506, what is that?</p> <p>11 A That's an isolation cell that's contained between</p> <p>12 those two courtrooms.</p> <p>13 Q Is there a toilet in there?</p> <p>14 A No.</p> <p>15 Q The next one is Holding Cell 549 and 550 behind</p> <p>16 Courtroom 500 and 502, what is that showing?</p> <p>17 A That's an isolation cell that's contained between</p> <p>18 the holding cells for Courtroom 500 and 502.</p> <p>19 Q Is there a toilet in that one?</p> <p>20 A No.</p> <p>21 Q Okay. Are there any holding cells on the 5th</p> <p>22 floor other than the ones shown in these photos?</p> <p>23 A No.</p> <p>24 Q Are there any other cameras on the fifth floor</p>
Page 52	Page 53
<p>1 other than the camera whose views are shown in these</p> <p>2 photos?</p> <p>3 A Yes.</p> <p>4 Q Where are those?</p> <p>5 A Public hallway.</p> <p>6 Q Okay. Are these holding cells on the fifth floor</p> <p>7 used for men or women?</p> <p>8 A Men.</p> <p>9 Q What if a female had to go to a courtroom on the</p> <p>10 fifth floor?</p> <p>11 A She would be held on the bridge until her court</p> <p>12 appearance was necessary and she would be brought up and</p> <p>13 directly to court.</p> <p>14 Q Same true on the fourth floor?</p> <p>15 A Yes.</p> <p>16 Q Next two photos, Holding Cell 685 behind</p> <p>17 Courtroom 106, can we put those together?</p> <p>18 A Yes.</p> <p>19 Q And what do those photos show?</p> <p>20 A The holding cell behind Courtroom 606.</p> <p>21 Q If somebody were going to Courtroom 606, would</p> <p>22 though likely be placed in this cell?</p> <p>23 A Yes.</p> <p>24 Q Is there a toilet on the left side of that?</p>	<p>1 A Yes.</p> <p>2 Q The next two, 64 Holding Cell 686 behind</p> <p>3 Courtroom 604, can we put those together?</p> <p>4 A Yes.</p> <p>5 Q And what do those photos show?</p> <p>6 A The holding cell behind Courtroom 604.</p> <p>7 Q If somebody were going to Courtroom 604, would</p> <p>8 they likely be placed in this holding cell?</p> <p>9 A Yes.</p> <p>10 Q And is there a toilet on the right side of that</p> <p>11 one?</p> <p>12 A Yes.</p> <p>13 Q The next two, cell 649 behind Courtroom 602, can</p> <p>14 we put those two together?</p> <p>15 A Yes.</p> <p>16 Q What do those photos show?</p> <p>17 A The holding cell behind Courtroom 602.</p> <p>18 Q If somebody were going to Courtroom 602, would</p> <p>19 they likely be placed in that holding cell?</p> <p>20 A Yes.</p> <p>21 Q Is there a toilet on the left side of that one?</p> <p>22 A Yes.</p> <p>23 Q The next two show cell 655 behind courtroom 600,</p> <p>24 can we put those together?</p>



Page 54	Page 55
<p>1 A Yes.</p> <p>2 Q And what do those photos show?</p> <p>3 A The holding cell behind Courtroom 600.</p> <p>4 Q If somebody were going to Courtroom 600, would</p> <p>5 they likely be placed in this cell?</p> <p>6 A Yes.</p> <p>7 Q Is there a toilet on the right side of that?</p> <p>8 A Yes.</p> <p>9 Q The next two looks like we have isolation cells</p> <p>10 again?</p> <p>11 A Yes.</p> <p>12 Q All right. So Holding Cell 685, 686 behind</p> <p>13 Courtroom 604 and 606, what does that photo show?</p> <p>14 A That shows the isolation cell that is contained</p> <p>15 between the holding cells for Courtroom 604 and 606.</p> <p>16 Q And is there a toilet in that?</p> <p>17 A No.</p> <p>18 Q The photo Holding Cell 647 and 649 behind</p> <p>19 Courtroom 600 and 602, what does that photo show?</p> <p>20 A That is the isolation cell that is contained</p> <p>21 between the holding cells for Courtroom 600 and 602.</p> <p>22 Q Are there any other holding cells on the sixth</p> <p>23 floor of that courthouse other than the ones that are in</p> <p>24 these photos?</p>	<p>1 A No.</p> <p>2 Q Are there any other cameras on the sixth floor</p> <p>3 other than the cameras whose views are shown in these</p> <p>4 photos?</p> <p>5 A Yes.</p> <p>6 Q Where are those?</p> <p>7 A Public hallway.</p> <p>8 Q Are these courtrooms on the sixth floor used for</p> <p>9 men or women?</p> <p>10 A Men.</p> <p>11 Q If a female had a court call up on the sixth</p> <p>12 floor, they would be taken straight from the bridge up to</p> <p>13 the courtroom?</p> <p>14 A Correct.</p> <p>15 Q The next two are Holding Cells 785 behind</p> <p>16 Courtroom 706, can we put those together?</p> <p>17 A Yes.</p> <p>18 Q And what do those photos show?</p> <p>19 A The holding cells behind Courtroom 706.</p> <p>20 Q If someone were to go into Courtroom 706, is this</p> <p>21 the holding cell they likely would be placed in?</p> <p>22 A Yes.</p> <p>23 Q Is there a toilet up on the left side of that</p> <p>24 one?</p>
Page 56	Page 57
<p>1 A Yes.</p> <p>2 Q The next two show Holding Cell 786 behind</p> <p>3 Courtroom 704, can I put those two together?</p> <p>4 A Yes.</p> <p>5 Q What do those two photos show?</p> <p>6 A The holding cell behind Courtroom 704.</p> <p>7 Q If somebody were going to Courtroom 704, would</p> <p>8 they likely be placed in this holding cell?</p> <p>9 A Yes.</p> <p>10 Q Is there a toilet on the right side of that one?</p> <p>11 A Yes.</p> <p>12 Q The next two show Holding Cell 749 behind</p> <p>13 Courtroom 702, can I put those two together?</p> <p>14 A Yes.</p> <p>15 Q What do those two photos show?</p> <p>16 A The holding cell behind Courtroom 702.</p> <p>17 Q If somebody were going to Courtroom 702, would</p> <p>18 they likely be placed in this holding cell?</p> <p>19 A Yes.</p> <p>20 Q Is that a toilet on the left side?</p> <p>21 A Yes.</p> <p>22 MS. EKL: I'm going to object for just a second. You</p> <p>23 rephrased that one slightly. You said is that a toilet</p> <p>24 on the left side. Are you asking him whether it's</p>	<p>1 visible in the photograph or are you asking him is there</p> <p>2 a toilet on the left side of the cell as you've been</p> <p>3 asking in the other questions?</p> <p>4 BY MR. ZIMMERMAN:</p> <p>5 Q Is there a toilet on the left side of that cell?</p> <p>6 A Yes.</p> <p>7 Q The next two is Holding Cell 750 behind Courtroom</p> <p>8 700, can I put those two together?</p> <p>9 A Yes.</p> <p>10 Q What do those photos showing?</p> <p>11 A The holding cell behind Courtroom 700.</p> <p>12 Q If somebody were going to Courtroom 700, would</p> <p>13 they likely be placed in the cell?</p> <p>14 A Yes.</p> <p>15 Q Is there a toilet on the right side?</p> <p>16 A Yes.</p> <p>17 Q The next two look like isolation cells, cells 785</p> <p>18 and 786 behind Courtroom 704 and 706, what is that photo</p> <p>19 showing?</p> <p>20 A That is an isolation cell that is contained</p> <p>21 between the holding cells for Courtrooms 704 and</p> <p>22 courtroom 706.</p> <p>23 Q And is there a toilet in that room?</p> <p>24 A No.</p>

<p style="text-align: right;">Page 58</p> <p>1 Q The next photo is Holding Cell 749 and 750 behind 2 Courtroom 700 and 702, what is that showing? 3 A It's an isolation cell that is contained between 4 the holding cells for Courtroom 700 and 702. 5 Q Is there a toilet in that one? 6 A No. 7 Q These holding cells on the seventh floor, are 8 those for men or women? 9 A Men. 10 Q If a woman was going up to the seventh floor for 11 court, would she be brought straight up from the bridge? 12 A Yes. 13 Q Are there any other holding cells on the seventh 14 floor other than these? 15 A No. 16 Q Are there any other cameras on the seventh floor 17 other than the cameras whose views are shown in those 18 photos? 19 A Yes. 20 Q And where are those at? 21 A Public hallway. 22 Q Which one does this go to? 23 A That's Domestic Violence Court. 24 MS. EKL: That's Domestic Violence.</p>	<p style="text-align: right;">Page 59</p> <p>1 MR. ZIMMERMAN: So, do we have a witness for this 2 one? 3 MS. EKL: No. 4 MR. ZIMMERMAN: Why is that? 5 MS. EKL: I'm not sure. 6 MR. ZIMMERMAN: So we'll add to our agreement to 7 produce somebody on this. 8 MS. EKL: If it falls within the definition. I just 9 need to find out why we don't have somebody. 10 MR. ZIMMERMAN: Okay. We have just realized that 11 there is a stack of photos from the Domestic Violence 12 Courthouse, but there is no 30(b)(6) witness here present 13 today to testify as to these photos; is that correct? 14 MS. EKL: Correct. 15 MR. ZIMMERMAN: So I will be seeking to have somebody 16 testify as a 30(b)(6) witness on these photos pursuant to 17 the deposition notice and that's that. 18 BY MR. ZIMMERMAN: 19 Q All right. Do you need a minute? Do you want 20 some water? 21 A No. I have a drink down here. 22 Q Is there any record that's kept to note that 23 there is somebody who is disabled when they come into the 24 courthouse?</p>
<p style="text-align: right;">Page 60</p> <p>1 A There is a record that's issued every morning by 2 the Department of Corrections of people that are coming 3 over that fall under ADA or may need some assistance. 4 Q Would that be maintained in the sheriff's 5 records? 6 A I am not sure. It's sent electronically from the 7 ADA compliance officer. 8 Q It's sent to who? 9 A The courthouse where those individuals are 10 scheduled to go to court. 11 Q I see. And then does the sheriff's office have 12 access to those records? 13 MS. EKL: If you know? 14 BY THE WITNESS: 15 A I don't know. 16 BY MR. ZIMMERMAN: 17 Q So do your staff have to make arrangements to 18 accommodate a person with a disability? 19 A If we receive a notice, it explains to us why we 20 are receiving a notice. So for example, John Jones is 21 coming to court today to Courtroom 101, but he's in a 22 wheelchair, so he may need someone to assist him in the 23 wheelchair of the court. That's the extent of the 24 notice.</p>	<p style="text-align: right;">Page 61</p> <p>1 Q All right. And what are the records that are 2 maintained with respect to receiving those notices within 3 your department? 4 A I don't know that. 5 Q Is there a special holding cell that somebody in 6 a wheelchair, for example, would be placed in? 7 A They would be kept on the bridge. They're only 8 brought up when it's time for court. They come up and 9 they go down, and I don't know where they stay down 10 there. That's run by the Department of Corrections. 11 Q So they would be kept in the bridge and then they 12 would go straight to the courtroom? 13 A Correct. 14 Q All right. Let go through the Plaintiffs. 15 Elizabeth Alicea, we'll start with her. 16 A I don't have any record of her attending court at 17 Leighton. 18 Q So if somebody comes in and they're booked, would 19 there be a record of that? 20 A Yes. 21 Q What's Branch 1, Room 100 Criminal Court; is that 22 Leighton? 23 A Yes, that's bond court. 24 Q So if they're brought in like at least my records</p>

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<p>1 show she was brought in on April 8, 2018, wouldn't your</p> <p>2 office have a record of that if assuming what I am saying</p> <p>3 is true?</p> <p>4 A Yes.</p> <p>5 Q And so what would you search in order to locate</p> <p>6 that record?</p> <p>7 A We would go into CCOMS to see if this individual</p> <p>8 has been in court and/or is still housed in the</p> <p>9 Department of Correction and/or with a future court date</p> <p>10 to return.</p> <p>11 Q And did you search CCOMS as part of your data</p> <p>12 gathering to prepare for your deposition today?</p> <p>13 A No.</p> <p>14 Q What is CCOMS stand for?</p> <p>15 A I can't tell you offhand. C-C-O-M-S. It's</p> <p>16 management system. It's relations to corrections, but I</p> <p>17 don't know the exact meaning for the acronym.</p> <p>18 Q Okay. So even if somebody were taken in to bond</p> <p>19 court and they posted bond and they're released, that</p> <p>20 would still show up in the CCOMS system, right?</p> <p>21 A Yeah. Every person that comes in whether it's</p> <p>22 someone who's already from the Department of Corrections</p> <p>23 or a newer arrest is booked into the county jail, they</p> <p>24 receive a county jail number so that tracks their</p>	<p>1 activity. They would be processed by the Department of</p> <p>2 Corrections, brought over for court, and then they go</p> <p>3 back to the Department of Corrections either to be housed</p> <p>4 or to be released.</p> <p>5 MR. ZIMMERMAN: Okay. Anymore on her?</p> <p>6 MR. HAGMAN: No.</p> <p>7 BY MR. ZIMMERMAN:</p> <p>8 Q How about Katina Ramos, do you have any record on</p> <p>9 her ever being there at Leighton?</p> <p>10 A No.</p> <p>11 Q Okay. So same question, if she were brought into</p> <p>12 bond court on October 21, 2017, would that show up in the</p> <p>13 CCOMS system?</p> <p>14 A Yes.</p> <p>15 Q How about Jack Artinian, do you have any record</p> <p>16 of him?</p> <p>17 A Yes.</p> <p>18 Q What do the Defendant's records show with respect</p> <p>19 to Mr. Artinian?</p> <p>20 A It shows that he had a court date on June 1,</p> <p>21 2017, in Courtroom 101.</p> <p>22 Q June 1, 2017?</p> <p>23 A Correct.</p> <p>24 Q That's Judge Haberkorn?</p>
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<p>1 A No.</p> <p>2 Q Judge Martin?</p> <p>3 A That would have been Judge Martin, correct.</p> <p>4 Q And general question, are there any records</p> <p>5 whether documents or electronic or otherwise that would</p> <p>6 show which particular holding cell somebody was actually</p> <p>7 placed in?</p> <p>8 A No.</p> <p>9 Q Do the Defendants have any records to show which</p> <p>10 holding cell or holding cells Jack Artinian was placed in</p> <p>11 on June the 1st, 2017?</p> <p>12 A No.</p> <p>13 Q You said Room 101 on that, right?</p> <p>14 A Correct.</p> <p>15 Q Thank you. Anything else on Jack?</p> <p>16 A No.</p> <p>17 Q Have you ever seen a booking associated view</p> <p>18 printout?</p> <p>19 A For these individuals?</p> <p>20 Q Right.</p> <p>21 A No.</p> <p>22 Q Let me show you one. This is Bates CCSAO Number</p> <p>23 45. It was produced to me in discovery in this case.</p> <p>24 Have you seen that before?</p>	<p>1 A No.</p> <p>2 Q Do you know what that shows? Have you seen those</p> <p>3 types of reports before generally?</p> <p>4 A Yes.</p> <p>5 Q Okay. What does that show?</p> <p>6 A This indicates that doesn't tell me when this was</p> <p>7 run, but it indicates that the individual was booked as a</p> <p>8 booking date for Cook County jail.</p> <p>9 Q So what does that mean he was booked in Cook</p> <p>10 County Jail?</p> <p>11 A That means that he came into Cook County Jail on</p> <p>12 that date and was processed in.</p> <p>13 Q And then would he have been placed in a holding</p> <p>14 cell?</p> <p>15 A Yes.</p> <p>16 Q And how many times does that record show that</p> <p>17 that occurred to Jack Artinian from October the 8th,</p> <p>18 2016, to the present?</p> <p>19 MS. EKL: I'm just going to object at this point in</p> <p>20 time. Your notice is how many times these individuals</p> <p>21 were placed in holding cells in the courthouse. Now,</p> <p>22 you're asking about holding cells in the Cook County</p> <p>23 Jail, which is a separate building separate and apart</p> <p>24 from the courthouse. He's not prepared to be testifying</p>

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<p>1 about this. It's outside the subject of your deposition</p> <p>2 notice.</p> <p>3 BY MR. ZIMMERMAN:</p> <p>4 Q The document that you're looking at is when you</p> <p>5 say that he would be processed in and placed in a holding</p> <p>6 cell, is that a different facility than the holding cells</p> <p>7 that we've been talking about in these photos?</p> <p>8 A Yes. It indicates on here RCDC, which is the</p> <p>9 receiving room of the Department of Corrections.</p> <p>10 Q Very good. Thank you.</p> <p>11 RCDC is different than Branch 1 Room 100</p> <p>12 Criminal Court, right?</p> <p>13 A Yes.</p> <p>14 Q What about Michelle Urrutia, did the Defendant's</p> <p>15 records turn anything up on her?</p> <p>16 A Yes.</p> <p>17 Q What did you find?</p> <p>18 A I have a listing of 16 appearances.</p> <p>19 Q Since August 8, 2016 to the present, has there</p> <p>20 been any appearance for Michelle Urrutia?</p> <p>21 A No.</p> <p>22 Q Can you look, sir, at Exhibit No. 2 for me,</p> <p>23 please.</p> <p>24 This is a deposition notice relating to a</p>	<p>1 schedule of documents listed as document schedules and</p> <p>2 there's eight of them. They're on the second and third</p> <p>3 pages under schedule of documents. Are you being</p> <p>4 tendered as the rule 30(b)(6) witness on behalf of the</p> <p>5 Defendants to testify concerning any of the topics in</p> <p>6 that list of 1 through 8?</p> <p>7 MS. EKL: I would object to the form of the question.</p> <p>8 The paragraphs enumerated 1 through 8 on Pages 2 and 3</p> <p>9 are part of your Rule 34 request for documents. Your</p> <p>10 Rule 30(b)(6) topics are on Pages 1 and 2 and as they</p> <p>11 related to documents.</p> <p>12 BY MR. ZIMMERMAN:</p> <p>13 Q So are you the Rule 30(b)(6) Witness to testify</p> <p>14 concerning any of the topics relating to the schedule of</p> <p>15 documents in 1 through 8?</p> <p>16 MS. EKL: He is designated the same as the last</p> <p>17 witness to testify about the topics in 1 through 8 the</p> <p>18 extent that he can about the unit head inspections, and</p> <p>19 then to the extent you've already asked him questions</p> <p>20 related to the documents that he has that could possibly</p> <p>21 relate to 8. Obviously, there is no document specific to</p> <p>22 8, but we agreed to let you explore that and you have.</p> <p>23 BY MR. ZIMMERMAN:</p> <p>24 Q All right. So this will be the third time I ask.</p>
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<p>1 So let me narrow it down now based on your attorney's</p> <p>2 statement.</p> <p>3 Is it true that you have been tendered here</p> <p>4 today to testify as to the topics in this notice of</p> <p>5 deposition in Exhibit No. 2 and then as it pertains to</p> <p>6 the schedule of documents Number 6 and Number 8?</p> <p>7 A What page, 2?</p> <p>8 Q Well, the schedule of documents will begin on</p> <p>9 Page 2, but 6 and 8 are on page 3.</p> <p>10 A Six, yes, and eight I'm uncertain I would have</p> <p>11 all documents of communication on that.</p> <p>12 Q All right. Well, let's start with 6.</p> <p>13 What did you do with respect to document</p> <p>14 schedule in Paragraph 6 to search for and obtain all of</p> <p>15 the documents of communications relative to the</p> <p>16 Defendant's unit heads inspections of the holding cell</p> <p>17 cameras as set forth in there?</p> <p>18 MS. EKL: I would just object to the question. If</p> <p>19 you can answer it, I will allow him to answer it, but</p> <p>20 this question is outside the scope of your topics. In</p> <p>21 terms of what search this individual did, assumes that he</p> <p>22 did the search or was the only person to do the search.</p> <p>23 Your topics don't ask for that.</p> <p>24 MR. ZIMMERMAN: Yes. Topic 6, the method of search</p>	<p>1 for the documents.</p> <p>2 BY MR. ZIMMERMAN:</p> <p>3 Q Sir, did you do any search for any documents</p> <p>4 relative to the schedule of documents in Number 6?</p> <p>5 A I did in relations to inspection sheets.</p> <p>6 Q Okay. And what did you search for?</p> <p>7 A The monthly inspection forms for the facility.</p> <p>8 Q How did you do that?</p> <p>9 A Went to the file.</p> <p>10 Q Are they kept in a paper file?</p> <p>11 A Hard copy.</p> <p>12 Q Well, then that wasn't too difficult. They were</p> <p>13 all there in a drawer or something?</p> <p>14 A From the time that I was there, yes. From the</p> <p>15 middle of March 17th until this date.</p> <p>16 Q Okay. What about prior to the middle of March of</p> <p>17 2017, what did you do to search for the monthly</p> <p>18 inspection sheets for that time period?</p> <p>19 A I checked our records and was unable to find any</p> <p>20 files that contain those reports.</p> <p>21 Q And so who did you go to and say hey, I can't</p> <p>22 find these, where are they at?</p> <p>23 A The individual who would have been responsible</p> <p>24 for completing those would have you retired when I came</p>

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<p>1 in, and there's no one else in the office that was aware 2 of that because those were his reports, and I don't know 3 if they were filed electronically or hard copy. 4 Q So the monthly inspection sheet, are they 5 submitted to someplace? 6 A Yes. 7 Q What place is that? 8 A Chief of Court's Office. 9 Q So did you go to the Chief of Court's Office and 10 ask them if they had those sheets prior to March of 2017? 11 A I went to the office when I turned in my copies 12 and informed them that I could not find any other reports 13 prior to middle of March 2017. 14 Q Okay. And then did they give you their copy of 15 them? 16 A No. 17 Q Did you ask them for them? 18 A No. 19 Q Why not? 20 A I was asked to turn in everything that I had and 21 that's what I gave them. 22 Q Gave who, your lawyers? 23 A The Chief of Court's office. 24 Q No. But for the purposes of this deposition</p>	<p>1 subpoena though, I am asking what was the method of 2 search for the documents, you know, what search was done 3 for the monthly inspection sheets? 4 MS. EKL: And you've asked that, and he's answered 5 that. But as far as what went to the lawyers and how it 6 was transmitted to the lawyers, now you're getting into 7 work product and attorney/client privilege -- 8 BY MR. ZIMMERMAN: 9 Q So it went over to the Chief of Court's and then 10 over to you. 11 I see. Well, the monthly inspection reports, do 12 they ordinarily go to the Chief of the Court's in the 13 ordinary course of business? 14 A Yes. 15 Q So you gave them another copy for the purpose of 16 this deposition, this lawsuit? 17 A This was a copy that was requested to turn in. 18 Q I see. So did you ask anybody about what the 19 search parameters were to try to find the monthly 20 inspection sheets that were done prior to March of 2017 21 by somebody else? 22 A No. 23 Q As you sit here today, do you know what, if 24 anything, was done to search for the monthly inspection</p>
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<p>1 sheets that existed prior to March of 2017? 2 A Any reports that we would have had from prior 3 years, what-have-you, may have been filed with the rest 4 of our weekly or monthly reports, but those are kept 5 separately at the county warehouse. 6 Q Okay. 7 A I do not know if they were shipped or not. And 8 like I said, I am not sure if my predecessor filed those 9 as hard copies or electronic. 10 Q Okay. The inspection reports themselves, if 11 there is an open work order, is it your course of 12 practice to attach it to the inspection report? 13 A No. 14 Q Are there any documents maintained by the 15 defendants that would show which holding cell a 16 particular pretrial detainee was placed in on any given 17 day? 18 A No. 19 MS. EKL: Counsel, I would just note that it's 4:00 20 and we haven't finished our second superintendent. We 21 have four the of them sitting here. We're now getting 22 into overtime. I just want to make sure that you're 23 intending on proceeding with every one this evening. 24 Otherwise, they're just sitting here costing the county</p>	<p>1 money. 2 MR. ZIMMERMAN: Well, we have had this discussion off 3 the record. So if you want to put it on the record, 4 we'll do that now. 5 I am happy to proceed tonight until people pass 6 out, we'll finish it up tonight, if we can. I also 7 offered that we can go as long as people will tolerate, 8 and then whoever we don't finish, we would agree that we 9 would take their depositions at some point after this 10 Friday, whether it's next week or the following week, but 11 agreement. You said, no to that. 12 MS. EKL: We haven't talked about continuing the 13 superintendents' deposition. That discussion was three 14 or four hours ago, and I said they are here. They were 15 all already in the area, and that the preference was 16 because they've been prepped and they were here for them 17 to proceed forward. This deposition now is moving into 18 longer than the last deposition. I am just trying to 19 gauge how much time -- if you think you're actually going 20 to get to them. 21 MR. ZIMMERMAN: Well, once again, we had this 22 discussion off the record, we'll have it again on the 23 record. I told you previously there was no way we were 24 going to finish all of these people tonight. You said</p>



<p style="text-align: right;">Page 74</p> <p>1 they're already in their car on the way, so they're</p> <p>2 coming here and we're just going to go and take them. I</p> <p>3 told you there's no way we're going to finish them.</p> <p>4 There's not enough hours in the day. I agreed to call</p> <p>5 them up, tell them to turn around, notice come here and</p> <p>6 we'll take them after the close of discovery deadline.</p> <p>7 You said no.</p> <p>8 MS. EKL: You did not say there was no way. If you</p> <p>9 had said there's no way, I would not have had them sit</p> <p>10 here for no reason. So if you're saying there's no way,</p> <p>11 then I will talk to them, let me know who you want, who</p> <p>12 you want to finish up tonight. I am just saying we're</p> <p>13 now getting into overtime, and I don't want to have them</p> <p>14 sit here if we're not going to get to them since it's</p> <p>15 already 4:00 --.</p> <p>16 MR. ZIMMERMAN: I don't know what overtime means. I</p> <p>17 worked the last two nights taking depositions with you of</p> <p>18 my Plaintiffs, and I got home at 10:00 at night, so I</p> <p>19 don't know what overtime means. I am happy to</p> <p>20 accommodate these gentlemen in any way that I can, which</p> <p>21 is why I told you that we should tell them to turn their</p> <p>22 car around and go back because it was likely not going to</p> <p>23 get finished tonight. You said, no. This gentleman was</p> <p>24 sitting here. This gentleman was sitting here. They all</p>	<p style="text-align: right;">Page 75</p> <p>1 heard me, so I'm not making this up. So if you want to</p> <p>2 continue these deps for another time by agreement, I am</p> <p>3 happy to do it. If you want to try to get them as long</p> <p>4 as we can tonight, I'll go to 3:00 in the morning taking</p> <p>5 deps, it doesn't matter to me.</p> <p>6 MS. EKL: Let's take a break.</p> <p>7 (Short recess.)</p> <p>8 MS. EKL: It is 4:15. All of the 30(b)(6) witnesses</p> <p>9 related to deposition Exhibit No. 1 have appeared and</p> <p>10 have been here. However, the depositions, not by fault</p> <p>11 of Counsel, but are taking longer than we expected.</p> <p>12 We're not going to be able to finish all of the</p> <p>13 depositions today is my understanding based on the</p> <p>14 numbers of questions you have, is that accurate?</p> <p>15 MR. ZIMMERMAN: That is my considerate opinion.</p> <p>16 MS. EKL: Rather than have these important gentlemen</p> <p>17 sitting around any longer, we agreed to continue three of</p> <p>18 their depositions until March 29th starting at 9:30 in</p> <p>19 the morning, and then they well finish those last three</p> <p>20 on that day. And they are all available on that day.</p> <p>21 MR. ZIMMERMAN: And then, of course we still have the</p> <p>22 Steve Bufard (phonetic) and Scott Achteroff (phonetic)</p> <p>23 and possibly a capital planning person as well and we are</p> <p>24 going to schedule at some point as well.</p>
<p style="text-align: right;">Page 76</p> <p>1 MS. EKL: Can they take off?</p> <p>2 MR. MILAZZO: I'm staying.</p> <p>3 MS. EKL: All right. Gentlemen, thank you.</p> <p>4 BY MR. ZIMMERMAN:</p> <p>5 Q All right. Nick reminded me of another question.</p> <p>6 So let's back up to Jack Artinian. June 1, 2017, he was</p> <p>7 brought in and then he was brought up to Courtroom 101, I</p> <p>8 believe was your testimony?</p> <p>9 A The date?</p> <p>10 Q June 1, 2017.</p> <p>11 A Yes.</p> <p>12 Q All right. So if you look at the Courtroom 101</p> <p>13 photos, there's four of them.</p> <p>14 A Yes.</p> <p>15 Q Which of those holding cells would he likely have</p> <p>16 been placed in?</p> <p>17 A Most likely he would have been in holding 1029,</p> <p>18 which is CAM 1.020, most likely.</p> <p>19 Q All right. Let's go back now to the deposition</p> <p>20 subpoena, not the subpoena, the dep notice, and I want to</p> <p>21 just run through some of these inspection checklists that</p> <p>22 we picked out as pertaining to Leighton, which is Exhibit</p> <p>23 No. 4. They're grouped by courthouse, so if you can flip</p> <p>24 through until you get to Leighton, then we're there. I</p>	<p style="text-align: right;">Page 77</p> <p>1 think it's number 1135 at the bottom, right corner is</p> <p>2 where it starts.</p> <p>3 A Okay.</p> <p>4 Q And then at least in my stack it goes to 1155, I</p> <p>5 don't know if they're all sequential though, and then 827</p> <p>6 and 873. Okay. So why don't we start with Bates number</p> <p>7 1135.</p> <p>8 You conducted the inspection, right?</p> <p>9 A Correct.</p> <p>10 Q And then it says down in the bottom box copies of</p> <p>11 documentation attached, no. And then work orders</p> <p>12 submitted for number 153871 bullpen room 704; do you see</p> <p>13 that?</p> <p>14 A Yes.</p> <p>15 Q All right. Where is that work order?</p> <p>16 A That was done electronically or verbally. Some</p> <p>17 of our work orders are done verbally because our worksite</p> <p>18 is the main office for facilities management. So a lot</p> <p>19 of times we're able to catch the workers when they're</p> <p>20 going out into the jail and would have everyone say this</p> <p>21 needs to be done, can you do this, whatever it is.</p> <p>22 Q Okay. Is there a way that we would know that by</p> <p>23 looking at the document?</p> <p>24 A If there is a work order number that's on here,</p>

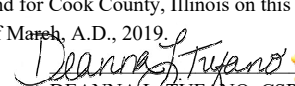


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<p>1 that means that it would have been submitted</p> <p>2 electronically or by voicemail. If you call facilities</p> <p>3 management, the work order line, whatever it is, they'll</p> <p>4 contact somebody, whatever it is, and you tell them what</p> <p>5 you want, whatever it is, and then they'll record it.</p> <p>6 Q Okay. And then they would generate a work order?</p> <p>7 A Yes.</p> <p>8 Q All right. So that's the next witness or set of</p> <p>9 witnesses. You aren't the work order person?</p> <p>10 A No.</p> <p>11 Q All right. And then it says bullpen room 704, is</p> <p>12 that holding cell behind Courtroom 704?</p> <p>13 A Correct.</p> <p>14 Q All right. So the work order would tell us what</p> <p>15 the issue was with that then, right?</p> <p>16 A Yeah, I know what the issue was.</p> <p>17 Q What was it?</p> <p>18 A Graffiti. That's the biggest number one thing on</p> <p>19 our monthly reports is graffiti removal.</p> <p>20 Q Okay. And why wasn't the entire building</p> <p>21 inspected?</p> <p>22 A Well, as it stipulates underneath there, whatever</p> <p>23 is in the explanation, it was limited in the courtrooms</p> <p>24 and adjoining spaces as well as the public walkways or</p>	<p>1 entries. I don't go through any of the private areas,</p> <p>2 the judge's chambers, the work areas, I would not go into</p> <p>3 that area.</p> <p>4 Q What about the video system number 13?</p> <p>5 A All of the monitors are checked on a routine</p> <p>6 basis. The reason why this is not checked is because of</p> <p>7 the fact that I had brought this up with my supervisor,</p> <p>8 Chief Avant, whatever it is, I was uncomfortable in</p> <p>9 checking that off because the statement says the system</p> <p>10 is recording and operational. I have no idea whether</p> <p>11 it's recording or not. I have no knowledge about that.</p> <p>12 So as a result, I couldn't mark that off.</p> <p>13 Q Okay. You know there's the policy that says that</p> <p>14 all of the holding cell should be recorded and those</p> <p>15 recordings are kept for 30 days, are you aware of that?</p> <p>16 A Yes.</p> <p>17 Q So you just didn't check the recording system?</p> <p>18 A Correct. I don't have access to that. It's not</p> <p>19 on-site.</p> <p>20 Q Where is it kept?</p> <p>21 A I don't know. You're going to have to ask Mr.</p> <p>22 Bufard about that, that's his job.</p> <p>23 Q Okay. Thank you.</p> <p>24 A Let me rephrase that. I am not aware of anyplace</p>
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<p>1 on my location where it's kept. There may be a recording</p> <p>2 room or someplace, but I do not have access to that.</p> <p>3 Q All right. Well, that would explain why it's</p> <p>4 never checked?</p> <p>5 A Correct.</p> <p>6 Q Can we turn to the next page sir, please, number</p> <p>7 1136?</p> <p>8 A Yes.</p> <p>9 Q All right. So we've got work orders, it looks</p> <p>10 like three of them for various bullpens, but those are a</p> <p>11 not attached, so those I would have to check with the</p> <p>12 work order guy --</p> <p>13 A Right. They would have been electronic. And</p> <p>14 once again, those were also for graffiti removal.</p> <p>15 Q You remember that?</p> <p>16 A Yes. It wasn't until I started getting further</p> <p>17 in there when I got into 1140 when I started putting the</p> <p>18 word graffiti on there so that would eliminate from any</p> <p>19 confusion from anyone else picking it up.</p> <p>20 Q How so?</p> <p>21 A Well, such as yourself, if you picked it up and</p> <p>22 you read that and you saw bullpens, I knew what it meant,</p> <p>23 but I didn't write it down. So then as we began going</p> <p>24 through it, I started marking it because I thought it</p>	<p>1 would be an occasional occurrence, but it's a monthly</p> <p>2 occurrence.</p> <p>3 Q Right.</p> <p>4 So the next page is 1137, another work order.</p> <p>5 Do you think that one was graffiti as well?</p> <p>6 A Yes.</p> <p>7 Q The next one is 1138, another work order. You</p> <p>8 think that was graffiti as well?</p> <p>9 A Yes.</p> <p>10 Q And the next one is 1139, there's a work order</p> <p>11 for bullpens and then one for monitors?</p> <p>12 A Yes.</p> <p>13 Q The bullpens would be graffiti?</p> <p>14 A Yes.</p> <p>15 Q How about the monitors?</p> <p>16 A Monitors if we put a work order in for the</p> <p>17 monitors, that means that they were not on. They lost</p> <p>18 power for whatever reason.</p> <p>19 Q All right. And this would be say behind 100 and</p> <p>20 102, is that the courtrooms?</p> <p>21 A Correct. Courtroom, 100 and Courtroom 102.</p> <p>22 Q So is there a monitoring room in the Leighton</p> <p>23 Courthouse where all of the holding cells, you know, the</p> <p>24 camera feeds will go to and can be monitored?</p>

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<p>1 A There isn't a monitoring room, no. I have a</p> <p>2 monitor in my office in the sheriff's office, but it's</p> <p>3 not set to any of the bullpens, holding cells.</p> <p>4 Q So in terms of these monitors behind 100 and --</p> <p>5 rooms 100 and 102, how would you have known they were not</p> <p>6 on?</p> <p>7 MS. EKL: Objection to the form of the question. I</p> <p>8 think you misspoke.</p> <p>9 BY MR. ZIMMERMAN:</p> <p>10 Q The monitors behind Courtrooms 100 and 102, this</p> <p>11 would be the holding cells behind Courtrooms 100 and 102.</p> <p>12 The monitors says were not on, so you submitted a work</p> <p>13 order, how did you know they were not on?</p> <p>14 A I inspected them.</p> <p>15 Q Where were they physically located?</p> <p>16 A They're behind the holding cell area. There is a</p> <p>17 small office between the holding cell and the courtroom.</p> <p>18 So when you come in out of the courtroom, there's a small</p> <p>19 office area, which is the sheriff's office of that area,</p> <p>20 there's a desk or a computer there, whatever it is, and</p> <p>21 then adjoining it would be the lockup area.</p> <p>22 Q Right. So this small sheriff's office, there's</p> <p>23 at least one on every floor; is that right?</p> <p>24 A For every courtroom.</p>	<p>1 Q There's one for every courtroom?</p> <p>2 A Yeah. There's one in every courtroom.</p> <p>3 Q And that particular sheriff's office would have a</p> <p>4 monitor for the holding cells for that courtroom?</p> <p>5 A Correct.</p> <p>6 Q And that's where the sheriff for a particular</p> <p>7 courtroom or courtrooms -- strike that. If there's an</p> <p>8 isolation cell, let's say the isolation cell behind</p> <p>9 Courtroom 202, for example, would that camera feed show</p> <p>10 up on the monitor for the sheriff for Courtroom 202?</p> <p>11 A Whatever the closest room would be, yeah. It</p> <p>12 would be 202, I'm sure.</p> <p>13 Q So that sheriff would be monitoring the actual</p> <p>14 holding cell for Courtroom 2020 and also possibly the</p> <p>15 isolation cell next to 202?</p> <p>16 A Yes.</p> <p>17 Q What about the isolation cell -- I'm just picking</p> <p>18 these out at random so there is no particular rhyme or</p> <p>19 reason. What approximate the isolation cell between</p> <p>20 Courtrooms 207 and 208. Now that one is in between two</p> <p>21 courtrooms, so is there any rhyme or reason as to whether</p> <p>22 the sheriff for Courtroom 207 would monitor that feed</p> <p>23 versus the sheriff for 208?</p> <p>24 A No, there wouldn't be.</p>
Page 84	Page 85
<p>1 Q One of them would, though?</p> <p>2 A Correct.</p> <p>3 Q But not both?</p> <p>4 A No. It's generally placed on the monitor of the</p> <p>5 closest one.</p> <p>6 Q Got it. What about the bridge area. So we've</p> <p>7 have got the upper bridge male, the upper bridge female,</p> <p>8 and the lower bridge, are there rooms that would monitor</p> <p>9 those camera feeds?</p> <p>10 A I don't know. That's controlled by the</p> <p>11 Department of Corrections.</p> <p>12 Q Okay.</p> <p>13 A I don't know what their capabilities -- I know</p> <p>14 that they can review the monitors there, I mean the</p> <p>15 video. How they do it, I am not certain.</p> <p>16 Q But in terms of like the realtime feed, is there</p> <p>17 a Department of Corrections room where they would have</p> <p>18 that on their monitors in realtime?</p> <p>19 A I don't know.</p> <p>20 Q So would the sheriff's office have access to the</p> <p>21 monitoring of the camera feed in realtime for the bridge</p> <p>22 area or is that just Department of Corrections would have</p> <p>23 access to that monitoring feed?</p> <p>24 A I am not exactly certain. I don't believe that</p>	<p>1 it would be exclusive to Department of Corrections, but</p> <p>2 I'm not certain as to who has access to it.</p> <p>3 Q All right. Back to inspection checklist, number</p> <p>4 1140. So now we have a work order for graffiti?</p> <p>5 A Now I specified on the reports that that's what</p> <p>6 it is so there was no confusion.</p> <p>7 Q So 1141 we've got graffiti, a security lock, and</p> <p>8 then lockup monitors for --</p> <p>9 A That's Courtroom 604.</p> <p>10 Q So this would be the holding cell behind</p> <p>11 Courtroom 604?</p> <p>12 A Correct.</p> <p>13 Q So when you do the inspection, you actually go</p> <p>14 and look at every single monitor to make sure that the</p> <p>15 camera feed is working?</p> <p>16 A Every courtroom is inspected.</p> <p>17 Q Okay. Number 1142, we've got graffiti again. No</p> <p>18 work order number, so you caught the guy as he was</p> <p>19 walking by?</p> <p>20 A That's the painter.</p> <p>21 Q Number 1143, we've got graffiti again, 1144</p> <p>22 graffiti, 1145 graffiti, 1146 graffiti, 1147 we've got</p> <p>23 graffiti, duress alarms graffiti overhead light. But</p> <p>24 then we also have monitor, so this would be the monitors</p>

<p style="text-align: right;">Page 86</p> <p>1 monitoring the camera feed in the holding cells behind  2 Courtrooms 202, 304 and 308 were not operational?  3 A Correct.  4 Q But 1148 it just says work order submitted for,  5 it says monitors. Do we know what that is?  6 A Because it is not specified on that courtroom or  7 whatever, I believe that that was the monitor in the  8 office.  9 Q And in which office would that be, sir?  10 A The sheriff's office, my office.  11 Q All right. And then 1149 is the same thing.  12 Would that also still be yours?  13 A Yes.  14 Q Did it break again?  15 A There was some electronic issues.  16 Q All right. Then let's go to 1151, there's that  17 monitor again. I think it was your office?  18 A Yes.  19 Q 1152, so this would be the monitors in that  20 monitor the holding cells behind Courtrooms 306, 506, and  21 606 were not functioning properly?  22 A Correct.  23 Q 1153, the monitors for the holding cells behind  24 Courtroom 700 and 404 needed repair of some sort?</p>	<p style="text-align: right;">Page 87</p> <p>1 A Yes.  2 Q 1154, the monitors monitoring the holding cells  3 behind Courtroom 604 and 704 needed work?  4 A Yes.  5 Q So this next one is Page 872 and 873, I don't  6 know if this is you or the work order guy. Under the  7 comments it says, the camera 2.043 view has changed; do  8 you see that?  9 A Yes.  10 Q And it needed an adjustment. Would you have  11 knowledge of that?  12 A The fact that it says it changed, I think that it  13 possibly means the feed that was on that camera. The  14 camera -- the monitor rather, the monitor has nine views  15 on it of the lockup, just like we had with the  16 photographs here where you showed two for the lockup  17 what-have-you, and then you have one for coming into the  18 courtroom, one in the side, and also the hallways leading  19 to the lockup.  20 Q Okay.  21 A I believing that since it says the view has  22 changed I am thinking that one of those boxes, whatever,  23 that was normally set on the walkway, or whatever it is,  24 for some reason changed.</p>
<p style="text-align: right;">Page 88</p> <p>1 Q The angle it says, I think, right?  2 A It needs to be adjusted for correct view because  3 there's multiple views on one monitor.  4 Q Well, here it says camera 2.043 Holding Cell 2090  5 behind Courtroom 203. What's the date on this, oh, June  6 of '17.  7 So would the work order have more specificity as  8 to what the issue was with the view and how it was  9 changed?  10 A No.  11 Q Well, in any event, the date on this is June 1st  12 of 2017 and then it was adjusted for correct view  13 September 20, 2017; is that right?  14 A Yeah. This is what the work order stipulated and  15 was closed. The updates, I'm not really sure what that  16 means.  17 MS. EKL: I'd ask you not to speculate. Again, I  18 mentioned this before, and I've give you some leeway with  19 this witness so that we don't have a reason to bring  20 someone back for another deposition, but now you're  21 asking him to speculate about things that are not in his  22 person knowledge --  23 BY MR. ZIMMERMAN:  24 Q All right So if you don't know, you don't know</p>	<p style="text-align: right;">Page 89</p> <p>1 --  2 MS. EKL: -- and definitely outside the topics of  3 your deposition notice.  4 BY MR. ZIMMERMAN:  5 Q But the photo we've got at least is date stamped  6 October 18, 2018; is that right?  7 A Yes.  8 Q So that would mean that's the date that this  9 photo was captured?  10 A Yes.  11 Q That date and time?  12 A I would believe that to be correct.  13 Q Okay. So that's after the adjustment was made.  14 Okay. Let's get back to -- Well, I think that's  15 it.  16 So approximately how many people come to the  17 Leighton Courthouse each day that are in custody from DOC  18 would you estimate?  19 A Obviously, it varies day-to-day. But we average  20 somewhere in the area of 300 males, and then I don't know  21 how many females. Usually, the female count is not very  22 high, somewhere maybe in the low 20s up to 30.  23 Q And then what would you estimate the number of  24 people come to the Leighton Courthouse from an outside</p>

<p style="text-align: right;">Page 90</p> <p>1 agency for a bond hearing each day?</p> <p>2 MS. EKL: Just to clarify because people come to pond</p> <p>3 hearings -- strike that. Go ahead.</p> <p>4 THE WITNESS: You're talking about in custody,</p> <p>5 correct?</p> <p>6 BY MR. ZIMMERMAN:</p> <p>7 Q Yes.</p> <p>8 A The numbers are going to be higher on the weekend</p> <p>9 on Saturday, Sunday, and holidays because that's the only</p> <p>10 bond court in the county.</p> <p>11 Q Okay.</p> <p>12 A During the week, we average somewhere close to 70</p> <p>13 males and maybe about 10 females.</p> <p>14 Q And what about the weekend?</p> <p>15 A That number is well over 200 and some days it's</p> <p>16 over 250.</p> <p>17 Q Total?</p> <p>18 A Yes.</p> <p>19 Q What would you estimate the number of people who</p> <p>20 come to the Leighton Courthouse who are transported from</p> <p>21 the Illinois Department of Corrections everyday?</p> <p>22 A That number will fluctuate, but a minimum, on an</p> <p>23 average day, a minimum of 40 to 50.</p> <p>24 Q Total?</p>	<p style="text-align: right;">Page 91</p> <p>1 A Yes.</p> <p>2 Q What about out of county folks in the custody of</p> <p>3 some transporting agency, about how many of those come to</p> <p>4 Leighton Courthouse a day?</p> <p>5 A Those are really a hit and miss. We may just get</p> <p>6 a handful a week.</p> <p>7 Q Is that all?</p> <p>8 A Yeah. It's strictly dependent upon whether they</p> <p>9 have an existing court case here that hasn't been</p> <p>10 resolved after a conviction somewhere else, or if they</p> <p>11 are coming in to be writed in on a trial or a case here</p> <p>12 as a possibility.</p> <p>13 Q I see.</p> <p>14 A If they have a trial coming up or what-have-you,</p> <p>15 in the county once again, they've got on open case here,</p> <p>16 they'll bring them here for their court appearances, but</p> <p>17 the judge at some point when he's going to have trial may</p> <p>18 writ him into to our custody for the duration of the</p> <p>19 trial so they can prevent the movement. It's just a</p> <p>20 handful a week. It's not too many.</p> <p>21 MR. ZIMMERMAN: Okay. Anything else?</p> <p>22 MR. HAGMAN: No.</p> <p>23 MR. ZIMMERMAN: That's all I have. Thank you, sir.</p> <p>24 THE WITNESS: Are you sure?</p>
<p style="text-align: right;">Page 92</p> <p>1 MS. EKL: I have a few follow-ups, just a few.</p> <p>2 EXAMINATION</p> <p>3 BY MS. EKL:</p> <p>4 Q The video monitoring screens that you testified</p> <p>5 about, are they all approximately the same size or do</p> <p>6 they vary based on location?</p> <p>7 A The monitors behind the courtrooms, they're</p> <p>8 basically the same size.</p> <p>9 Q And approximately how large are those monitors?</p> <p>10 A They're about 12 by 20.</p> <p>11 Q And do each of those monitors capture one</p> <p>12 location or multiple locations?</p> <p>13 A Just the work area that's where it's assigned.</p> <p>14 Q What I am getting at, is there an image of one</p> <p>15 location or are there multiple images on one screen?</p> <p>16 A Each monitor is split. It contains nine images.</p> <p>17 Q And approximately how large then are each of</p> <p>18 those nine images that you would be able to view if you</p> <p>19 were looking at the screen?</p> <p>20 A They're about -- they're a little bit smaller</p> <p>21 than a photograph, like a 4 by 6 photograph. So let's</p> <p>22 say three-and-a-half by 6.</p> <p>23 Q The areas where these screens are located, are</p> <p>24 they continuously watched by court personnel by either</p>	<p style="text-align: right;">Page 93</p> <p>1 the officers or anyone else?</p> <p>2 MR. ZIMMERMAN: Object to Foundation. Go ahead.</p> <p>3 BY THE WITNESS:</p> <p>4 A No.</p> <p>5 BY MS. EKL:</p> <p>6 Q I'm assuming in the course of your job, you've</p> <p>7 had occasion during the days to walk by these different</p> <p>8 locations; is that correct?</p> <p>9 A Yes.</p> <p>10 Q And to observe the employees that you're in</p> <p>11 charge of doing their jobs?</p> <p>12 A Yes.</p> <p>13 Q And during the course of the times that you've</p> <p>14 walked by these locations during the day, have you</p> <p>15 noticed that there are not people continuously watching</p> <p>16 the monitors?</p> <p>17 A Yes.</p> <p>18 Q Is there anyone whose job duties as you know them</p> <p>19 is to sit there and continuously watch these video</p> <p>20 monitors?</p> <p>21 A No.</p> <p>22 Q What is the purpose of having the monitors in the</p> <p>23 various locations in the Leighton Courthouse?</p> <p>24 A They're there to be able to check the detainees</p>

<p style="text-align: right;">Page 94</p> <p>1 in the back to see if there's somebody in the back and/or</p> <p>2 in the event that we did not have someone in the back, we</p> <p>3 would do visual or physical checks on the prisoners to</p> <p>4 make sure that they're safe. Now that we have Department</p> <p>5 of Corrections personnel that are assigned back there, we</p> <p>6 don't have to do that.</p> <p>7 Q There's been a number of questions related to</p> <p>8 what's been referred to as the bridge. Is the bridge</p> <p>9 considered part of the courthouse facility?</p> <p>10 A It's physically part of it, physically is in the</p> <p>11 basement part. It literally is a bridge. It connects</p> <p>12 between the court building and the Department of</p> <p>13 Corrections next door.</p> <p>14 Q But for purposes of job duties and</p> <p>15 responsibilities, for instance, you're in charge of the</p> <p>16 court facility at Leighton Courthouse, correct?</p> <p>17 A Yes.</p> <p>18 Q And are the employees who work the bridge area,</p> <p>19 the officers that work the bridge area, do they fall</p> <p>20 underneath you in terms of are you responsible for</p> <p>21 supervising them?</p> <p>22 A No.</p> <p>23 Q Is it accurate to say that they're part of the</p> <p>24 Department of Corrections?</p>	<p style="text-align: right;">Page 95</p> <p>1 A Yes.</p> <p>2 Q Does the Leighton Courthouse have both the old</p> <p>3 camera system as well as the new camera system?</p> <p>4 A It has the new camera system throughout with the</p> <p>5 exception of the old monitor in the branch court in 102</p> <p>6 and 100.</p> <p>7 Q Counsel asked you a number of questions about the</p> <p>8 different cells, and this was in Deposition Exhibit No.</p> <p>9 5. In relation to each of those cells, he asked you</p> <p>10 whether or not, for instance, an individual going to a</p> <p>11 particular courtroom was likely to have been placed in a</p> <p>12 certain cell. Do you remember him generally asking you</p> <p>13 those questions?</p> <p>14 A Yes.</p> <p>15 Q Is it true to say that individuals are not</p> <p>16 absolutely always placed in one particular cell in</p> <p>17 relation to one particular courtroom?</p> <p>18 A Yes.</p> <p>19 Q And is that why you said -- well, what did you</p> <p>20 mean by likely placed into a certain cell?</p> <p>21 A Because if it was -- if it's a prisoner for</p> <p>22 Courtroom 308, the likely place would be to place him</p> <p>23 behind 308. But once again, the population on that floor</p> <p>24 fluctuates day-to-day and the Department of Corrections</p>
<p style="text-align: right;">Page 96</p> <p>1 officer who is in charge of those holding areas may need</p> <p>2 to move them to a different cell to utilize that cell for</p> <p>3 something else.</p> <p>4 Q In addition to population fluctuation, is there</p> <p>5 any other reason why a person would not be put in the</p> <p>6 cell that would be more likely used?</p> <p>7 A If it was a male/female holding. If we had to</p> <p>8 house a female in a certain cell, then they would be</p> <p>9 excluded from the other ones.</p> <p>10 Q And if for instance someone from the Department</p> <p>11 of Corrections needed to be held for the same courtroom</p> <p>12 as persons that were coming over from the Illinois</p> <p>13 Department of Corrections, would they be placed in</p> <p>14 separate cells or the same cells?</p> <p>15 A They would not be housed together.</p> <p>16 Q So that would be an instance where one of those</p> <p>17 individuals would have to go into a different cell,</p> <p>18 correct?</p> <p>19 A Correct.</p> <p>20 MS. EKL: That's all I have.</p> <p>21 MR. ZIMMERMAN: We're done.</p> <p>22 THE WITNESS: Are you sure. Thank you for your time.</p> <p>23 MR. ZIMMERMAN: Thank you.</p> <p>24 (Ending time: 4:50 p.m.)</p>	<p style="text-align: right;">Page 97</p> <p>1 REPORTER'S CERTIFICATE</p> <p>2 The within and foregoing statement of the</p> <p>3 witness, EDWARD SAJDAK, taken before DEANNA L. TUFANO</p> <p>4 CSR, and Notary Public, at 77 West Washington, Suite</p> <p>5 1220, in the City of Chicago, Cook County, Illinois, at</p> <p>6 2:12 o'clock p.m. on the 13th of March, A.D., 2019.</p> <p>7 The said witness was first duly sworn and was</p> <p>8 then examined upon oral interrogatories; and the</p> <p>9 questions and answers were taken down in shorthand by the</p> <p>10 undersigned, acting as stenographer and Notary Public;</p> <p>11 and the within and foregoing is a true, correct, and</p> <p>12 accurate record of all of the questions asked of and</p> <p>13 answers made by the said witness, EDWARD SAJDAK, the time</p> <p>14 and place hereinabove referred to.</p> <p>15 The undersigned is not interested in the within</p> <p>16 case, nor of kin or counsel to any of the parties.</p> <p>17 Witness my official signature and seal as Notary</p> <p>18 Public in and for Cook County, Illinois on this</p> <p>19 31st Day of March, A.D., 2019.</p> <p>20   DEANNA L. TUFANO, CSR,  CSR No. 084-003819  MAGNA LEGAL SERVICES  SEVEN PENN CENTER  1635 MARKET STREET, 8TH FLOOR  PHILADELPHIA, PA 19103  (866) 624-6221</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>